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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
January 2006 Grand Jury

JAH

07 CR 1312

[REDACTED]

UNITED STATES OF AMERICA,  
Plaintiff,

v.

PHUONG QUOC TRUONG (1),  
aka "Pai Gow" John,  
aka John Truong,  
VAN THU TRAN (2),  
TAI KHIEM TRAN (3),  
ANH PHUONG TRAN (4),  
PHAT NGOC TRAN (5),  
MARTIN LEE ARONSON (6),  
aka Martin Smith,  
LIEM THANH LAM (7),  
GEORGE MICHAEL LEE (8),  
TIEN DUC VU (9),  
SON HONG JOHNSON (10),  
BARRY WELLFORD (11),  
NAM VAN TO (12),  
aka "Tommy",  
KHAI HONG TRAN (13),  
JOHN TRAN (14),  
WILLY TRAN (15),  
aka "Duy",  
TUAN MONG LE (16),  
DUC CONG NGUYEN (17),  
HAN TRUONG NGUYEN (18),  
HA THUY GIANG (19),  
aka Thuy Ha Giang,

Defendants.

Criminal Case No. \_\_\_\_\_

I N D I C T M E N T

Title 18, U.S.C., Sec. 1962(d) -  
Conspiracy to Conduct the Affairs  
of an Enterprise Through a Pattern  
of Racketeering Activity;  
Title 18, U.S.C., Sec. 371 -  
Conspiracy; Title 18, U.S.C.,  
Sec. 1167 - Conspiracy to Commit  
Theft from Gaming Establishments  
on Indian Lands; Title 18, U.S.C.,  
Sec. 1343 - Conspiracy to Commit  
Wire Fraud; Title 18, U.S.C.,  
Sec. 1952 - Conspiracy to Travel  
Interstate and Foreign Commerce in  
Aid of Racketeering; Title 18,  
U.S.C., Sec. 1512 - Conspiracy to  
Tamper with a Witness; Title 18,  
U.S.C., Sec. 2314 - Conspiracy to  
Transport Stolen Property in  
Interstate and Foreign Commerce;  
Title 18, U.S.C., Sec. 2315 -  
Conspiracy to Receive, Possess,  
Conceal, Store, Sell and Dispose  
of Stolen Property that has  
Traveled in Interstate and  
Foreign Commerce; Title 18,  
U.S.C., Sec. 2 - Aiding and  
Abetting; Title 18,  
U.S.C., Sec. 1956(h) - Conspiracy  
to Commit Money Laundering;  
Title 18, U.S.C., Secs. 1963 and  
982 - Criminal Forfeiture

1 The grand jury charges:

2 **GENERAL ALLEGATIONS**

3 At all times material to this Indictment:

4 **A. Gaming Facilities**

5 1. The Agua Caliente Casino and the Spa Resort and Casino were  
6 Indian gaming facilities operated by the Agua Caliente Band of  
7 Cahuilla Indians, a federally recognized Indian Tribe. The United  
8 States government holds lands in trust for the benefit of the tribe  
9 in the vicinity of Palm Springs, California, and Rancho Mirage,  
10 California. The government of the tribe oversees operation of these  
11 facilities on federal trust lands under its jurisdiction. Gaming  
12 operated in the jurisdiction of the tribe was authorized by tribal  
13 ordinance, which was approved by the National Indian Gaming Commission  
14 (hereinafter the "NIGC") on November 15, 1993, in accordance the  
15 Indian Gaming Regulatory Act of 1988, Title 25, United States Code,  
16 Section 2710, hereinafter the "IGRA."

17 2. The Barona Valley Ranch Casino and Resort was an Indian  
18 gaming facility operated by the Barona Group of Capitan Grande Mission  
19 Indians, a federally recognized Indian Tribe. The United States  
20 government holds lands in trust for the benefit of the tribe in the  
21 vicinity of Lakeside, California. The government of the tribe  
22 oversees operation of these facilities on federal trust lands under  
23 its jurisdiction. Gaming operated in the jurisdiction of the tribe  
24 was authorized by tribal ordinance, which was approved by the NIGC on  
25 February 28, 1994, in accordance with the IGRA.

1        3.        Beau Rivage Casino was a casino licensed by the State of  
2 Mississippi with gross annual revenues of over \$1,000,000 for 2004 and  
3 2005. In 2004 and 2005, the casino was engaged in interstate commerce  
4 and its activities affected interstate commerce.

5        4.        The Cache Creek Casino Resort was an Indian gaming facility  
6 operated by the Rumsey Indian Rancheria of Wintun Indians of  
7 California, a federally recognized Indian Tribe. The United States  
8 government holds lands in trust for the benefit of the tribe in the  
9 vicinity of Brooks, California. The government of the tribe oversees  
10 operation of these facilities on federal trust lands under its  
11 jurisdiction. Gaming operated in the jurisdiction of the tribe was  
12 authorized by tribal ordinance, which was approved by the NIGC on  
13 January 28, 1994, and amended December 18, 1998, in accordance the  
14 IGRA.

15        5.        Caesars Indiana Hotel and Casino was a casino licensed by  
16 the State of Indiana with gross annual revenues of over \$1,000,000 for  
17 2004. In 2004, the casino was engaged in interstate commerce and its  
18 activities affected interstate commerce.

19        6.        The Emerald Queen Casino was an Indian gaming facility  
20 operated by the Puyallup Tribe of Indians, a federally recognized  
21 Indian Tribe. The United States government holds lands in trust for  
22 the benefit of the tribe in the vicinity of Tacoma, Washington. The  
23 government of the Tribe oversees operation of this facility on federal  
24 trust lands under its jurisdiction. Gaming operated in the  
25 jurisdiction of the tribe was authorized by tribal ordinance, which  
26 was approved by the NIGC on July 29, 1994 and amended on December 4,  
27 2000, in accordance the IGRA.

1        7. The Foxwoods Resort Casino was an Indian gaming facility  
2 operated by the Mashantucket Pequot Indian Tribe, a federally  
3 recognized Indian Tribe. The United States government holds lands in  
4 trust for the benefit of the tribe in the vicinity of Ledyard,  
5 Connecticut. The government of the Tribe oversees operation of this  
6 facility on federal trust lands under its jurisdiction. Gaming  
7 operated in the jurisdiction of the tribe was authorized by tribal  
8 ordinance, which was approved by the NIGC on February 7, 1995, in  
9 accordance the IGRA.

10       8. The Golden Moon Hotel and Casino was an Indian gaming  
11 facility operated by the Mississippi Band of Choctaw Indians, a  
12 federally recognized Indian Tribe. The United States government holds  
13 lands in trust for the benefit of tribe in the vicinity of  
14 Philadelphia, Mississippi. The government of the tribe oversees  
15 operation of the Golden Moon Hotel and Casino, a portion of the Pearl  
16 River Resort that also includes the Silver Star Hotel and Casino, on  
17 federal trust lands under its jurisdiction. Gaming operated in the  
18 jurisdiction of the tribe is authorized by tribal gaming ordinance  
19 that was approved by the NIGC on November 8, 1993, in accordance with  
20 the IGRA.

21       9. Gold Strike Casino Resort was a casino licensed by the State  
22 of Mississippi with gross annual revenues of over \$1,000,000 for 2006.  
23 In 2006, the casino was engaged in interstate commerce and its  
24 activities affected interstate commerce.

25       10. Horseshoe Casino and Hotel was a casino licensed by the  
26 State of Mississippi with gross annual revenues of over \$1,000,000 for  
27 2006. In 2006, the casino was engaged in interstate commerce and its  
28 activities affected interstate commerce.

1        11. Isle of Capri Casino was a casino licensed by the State of  
2 Louisiana with gross annual revenues of over \$1,000,000 for 2006. In  
3 2006, the casino was engaged in interstate commerce and its activities  
4 affected interstate commerce.

5        12. L'Auberge du Lac Hotel and Casino was a casino licensed by  
6 the State of Louisiana with gross annual revenues of over \$1,000,000  
7 for 2005. In 2005, the casino was engaged in interstate commerce and  
8 its activities affected interstate commerce.

9        13. Morongo Resort and Casino was an Indian gaming facility  
10 operated by the Morongo Band of Mission Indians, a federally  
11 recognized Indian Tribe. The United States government holds lands in  
12 trust for the benefit of the tribe in the vicinity of Cabazan,  
13 California. The government of the Morongo Band of Mission Indians  
14 oversees operation of this facility on federal trust lands under its  
15 jurisdiction. Gaming operated in the jurisdiction of the tribe is  
16 authorized by Tribal gaming ordinance, which was approved by the NIGC  
17 on May 31, 1995, in accordance with the IGRA.

18        14. The Nooksack River Casino was an Indian gaming facility  
19 operated by the Nooksack Indian Tribe, a federally recognized Indian  
20 Tribe. The United States government holds lands in trust for the  
21 benefit of the tribe in the vicinity of Deming, Washington. The  
22 government of the Nooksack Indian Tribe oversees operation of this  
23 facility on federal trust lands under its jurisdiction. Gaming  
24 operated in the jurisdiction of the tribe was authorized by tribal  
25 ordinance, which was approved by the NIGC on January 10, 1994, in  
26 accordance the IGRA.

1        15. Palace Station Hotel and Casino was a casino licensed by the  
2 State of Nevada with gross annual revenues of over \$1,000,000 for  
3 2004. In 2004, the casino was engaged in interstate commerce and its  
4 activities affected interstate commerce.

5        16. Resorts East Chicago Hotel and Casino was a casino licensed  
6 by the State of Indiana with gross annual revenues of over \$1,000,000  
7 for 2005. In 2005, the casino was engaged in interstate commerce and  
8 its activities affected interstate commerce.

9        17. The Sycuan Resort and Casino was an Indian gaming facility  
10 operated by the Sycuan Band of Kumeyaay Nation, a federally recognized  
11 Indian Tribe. The United States government holds lands in trust for  
12 the benefit of the tribe in the vicinity of El Cajon, California. The  
13 government of the tribe oversees operation of these facilities on  
14 federal trust lands under its jurisdiction. Gaming operated in the  
15 jurisdiction of the tribe was authorized by tribal ordinance, which  
16 was approved by the NIGC on November 8, 1994, and amended on August  
17 30, 2006, in accordance with the IGRA.

18                    **B. Description of Blackjack**

19        18. The object in the game of blackjack is for the player to  
20 draw cards with a value that total 21 or come closer to 21 than the  
21 dealer. All cards count at face value, except for jacks, queens, and  
22 kings which count as 10, and the ace which counts as either 1 or 11,  
23 at the player's option.  
24  
25  
26  
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28

1        19. Blackjack usually is played with between one to six full  
2 decks of cards, which are shuffled by a dealer and dealt from a "shoe"  
3 (a rectangular box designed to hold several decks of cards, with a  
4 slot at the front that allows a dealer to quickly draw one card at a  
5 time). After players have completed placing their bets, the dealer  
6 will give each player two cards. The dealer will receive two cards,  
7 one face up and one face down (known as the "hole card").

8        20. If the initial two cards are an ace and a ten value card,  
9 the hand is a "blackjack." A blackjack beats any other combination  
10 of cards except another blackjack. If both the player and the dealer  
11 have blackjack, the hand is a "push," and the player neither wins nor  
12 loses.

13       21. After the players have received their initial two cards,  
14 they can choose to "stand" (draw no more cards), or take a "hit" (draw  
15 one or more cards). If the player's card total exceeds 21, they  
16 "break" and automatically lose.

17       22. After all the players have finished drawing to their hands,  
18 the dealer will expose his hole card. The dealer must draw an  
19 additional card if his point total is 16 or less and must stand if he  
20 has 17 or more.

21       23. If the dealer breaks, the remaining players who have not  
22 broken automatically win. If the dealer's point total is less than  
23 the player's point total, the player wins. If the dealer's point  
24 total is more than the player's, the player loses. If the dealer and  
25 the player have the same point total, the hand is a "push", and the  
26 player neither wins nor loses.

27

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1        24. All winning bets are paid even money (\$1 in winnings for  
2 ever dollar bet) except blackjacks (point totals of 21) which are paid  
3 at odds of 3 to 2.

4        25. If a blackjack player were to follow a perfect strategy, the  
5 proven odds for blackjack are approximately 49 to 51 in favor of the  
6 casino.

7                                    **C. Description of Mini-Baccarat**

8        26. In mini-baccarat, like regular baccarat, two hands are  
9 dealt—one called the "banker's hand" and the other called the  
10 "player's hand." Players at a table bet prior to a hand being dealt  
11 and bet on which of the two hands they believe will win. The winning  
12 hand is the hand that, under the rules of the game, comes closer to  
13 the total of nine. The rules do not allow the player or the dealer  
14 any discretion in deciding when to hold or draw on a hand.  
15 Consequently, the result of each hand is in no way affected by  
16 personal decisions by the dealer or players in the game.

17        27. Mini-baccarat usually is played with six to eight full decks  
18 of cards, which are shuffled by a dealer and dealt from a shoe. Up  
19 to nine players can be seated at the table. At some casinos,  
20 additional bettors, known as "back-bettors," can stand behind players.  
21 Play begins when the player's hand and banker's hand are dealt from  
22 the shoe. Usually, only two hands are dealt regardless of the number  
23 of players at the table. Each hand initially consists of two cards.  
24 The rules of the game determine whether a third card is dealt to  
25 either hand. Neither the players nor the dealer have any discretion  
26 in determining whether to hold or to deal a third card to a hand.



1        28. The first four cards are dealt from the shoe in alternating  
2 order, with the result being that the first and third cards are dealt  
3 to the player's hand, while the second and fourth cards are dealt to  
4 the banker's hand. Mini-baccarat game rules dictate whether a fifth  
5 or sixth card is necessary and whether the cards are dealt to the  
6 player's hand and/or banker's hand, respectively. All cards count as  
7 face value except tens and face cards, which have a value of 0. For  
8 example, an ace equals one and a five equals five. If the total or  
9 "point count" of the cards in a hand is a two-digit number, the left  
10 digit is disregarded and the right digit constitutes the point count  
11 (for example, the point count for a hand consisting of the following  
12 two cards, an 8 and a 6, would be 4 after dropping the left digit from  
13 the sum total of 14).

14        29. Players bet prior to a hand being dealt and have three  
15 betting options: Betting on the player's hand, betting on the  
16 banker's hand, or betting on a tie. All winning bets on the player's  
17 hand or banker's hand are paid at odds of 1 to 1, while the odds on  
18 a tie bet are paid at odds of 9 for 1. The winning hand is the one  
19 under the rules of the game that comes closest to the total point  
20 count of 9. The Casino provides mini-baccarat scorecards for players  
21 to use. A typical and legitimate player use of a scorecard is to  
22 record "runs," i.e., a series of player's or banker's winning hands,  
23 for the player's use in making betting decisions. Tracking play in  
24 this manner, however, has no bearing on, and provides no insight, into  
25 the statistical outcome of the game.

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1        30. All of the cards dealt in a hand of mini-baccarat are placed  
2 into the discard rack in a specific order. The dealer slides the  
3 cards from dealer's right hand to his or her left, face up with the  
4 first card on the right on the bottom and the last card on the left  
5 on the top. The dealer then turns the cards face down and places them  
6 into the discard rack. The same procedure is followed for each hand  
7 until all the cards are dealt from the shoe. Consequently, knowing  
8 the order of the cards going into the discard rack allows a player who  
9 is tracking cards to know the order that the tracked cards will come  
10 out of the shoe if those cards are not shuffled.

Count 1  
18 U.S.C. § 1962 (d)  
(Racketeering Conspiracy)

13           1.     The allegations contained in paragraphs 1 through 30 of the  
14 General Allegations of this Indictment are realleged in this Count and  
15 incorporated by reference as if fully set forth herein.

### A. The Enterprise

2. Defendants PHUONG QUOC TRUONG, aka "Pai Gow" John, aka John Truong, VAN THU TRAN, TAI KHIEM TRAN, ANH PHOUNG TRAN, PHAT NGOC TRAN, MARTIN LEE ARONSON, aka Martin Smith, LIEM THANH LAM, GEORGE MICHAEL LEE, TIEN DUC VU, SON HONG JOHNSON, BARRY WELLFORD, WILLY TRAN, aka "Duy," HAN TRUONG NGUYEN, and HA THUY GIANG, aka Thuy Ha Giang, and others known and unknown to the grand jury, were members and associates of the Tran Organization, a criminal organization whose members and associates engaged in criminal activities involving the theft of large amounts of money from casinos and gaming establishments through a card-cheating scheme. At all relevant times, this organization operated within the Southern District of California and elsewhere.

1        3. At all times relevant to the Indictment, within the Southern  
2 District of California and elsewhere, defendants PHUONG QUOC TRUONG,  
3 aka "Pai Gow" John, aka John Truong, VAN THU TRAN, TAI KHIEM TRAN, ANH  
4 PHUONG TRAN, PHAT NGOC TRAN, MARTIN LEE ARONSON, aka Martin Smith,  
5 LIEM THANH LAM, GEORGE MICHAEL LEE, TIEN DUC VU, SON HONG JOHNSON,  
6 BARRY WELLFORD, WILLY TRAN, aka "Duy," HAN TRUONG NGUYEN, and HA THUY  
7 GIANG, aka Thuy Ha Giang, together with other persons known and  
8 unknown to the grand jury, were members and associates of the "Tran  
9 Organization," which constituted an Enterprise as that term is defined  
10 within the meaning of Title 18, United States Code, Section 1961(4),  
11 that is, a group of individuals associated in fact (hereinafter the  
12 "Tran Organization" or "the Enterprise").

13        4. The Tran Organization constituted an ongoing organization  
14 whose members functioned as a continuing unit for a common purpose of  
15 achieving the objectives of the Enterprise. The Tran Organization was  
16 engaged in, and its activities affected, interstate and foreign  
17 commerce.

18                                **B. Purposes of the Enterprise**

19        5. The purposes of the enterprise included the following:

20                a. Enriching the defendants and members and associates of  
21 the Enterprise through, among other things, the theft of money from  
22 both Indian and non-Indian casinos and gaming establishments by  
23 cheating at gambling; bribing casino employees and officials to  
24 facilitate cheating at gambling; engaging in illegal gambling, and  
25 operating an illegal gambling business; using hidden microphones and  
26 cellular telephones to secretly transmit information that enabled the  
27 Enterprise and its associates to cheat at gambling; avoiding currency  
28 reporting requirements through structuring the cashing of gambling

1 chips and other means; money laundering; transporting stolen money and  
2 property worth \$5,000 and more across state and international borders;  
3 receiving, possessing, concealing, and disposing of such stolen money  
4 and property after it crossed state and United States boundaries,  
5 knowing the same to have been stolen, unlawfully converted, and taken  
6 before crossing such boundaries; and failing to report accurate income  
7 on taxes;

8           b.     Acquiring real and personal property for the members  
9 and associates of the Enterprise in the United States and abroad;

10           c.     Preserving and protecting the territory and profits of  
11 the Enterprise through the use of intimidation and threats;

12           d.     Preserving and protecting the territory and profits of  
13 the Enterprise through the use of bribes and financial incentives; and

14           e.     Promoting and enhancing the Enterprise and its members'  
15 and associates' activities.

16                   **C.   The Racketeering Conspiracy**

17           6.     From in or about March 2002 and continuing to the present,  
18 within the Southern District of California and elsewhere, defendants,  
19 PHUONG QUOC TRUONG, aka "Pai Gow" John, aka John Truong, VAN THU TRAN,  
20 TAI KHIEM TRAN, ANH PHUONG TRAN, PHAT NGOC TRAN, MARTIN LEE ARONSON,  
21 aka Martin Smith, LIEM THANH LAM, GEORGE MICHAEL LEE, TIEN DUC VU, SON  
22 HONG JOHNSON, BARRY WELLFORD, WILLY TRAN, aka "Duy," HAN TRUONG  
23 NGUYEN, and HA THUY GIANG, aka Thuy Ha Giang, together with other  
24 persons known and unknown to the grand jury, being persons employed  
25 by and associated with the Tran Organization, an enterprise, which  
26 engaged in, and the activities of which affected, interstate and  
27 foreign commerce, knowingly and intentionally conspired to violate  
28 Section 1962(c) of Title 18, United States Code, that is, to conduct

1 and participate, directly and indirectly, in the conduct of the  
2 affairs of an enterprise through a pattern of racketeering activity,  
3 as that term is defined in Sections 1961(1) and (5) of Title 18,  
4 United States Code, consisting of:

5 a. Multiple acts involving:

6 (1) Gambling, in violation of Indiana Code 4-33-10-2  
7 and 35-50-2-7; Nevada Revised Statutes 465.070, 465.083, 465.088;  
8 Mississippi Code Sections 75-76-301, 75-76-303, 75-76-307, 75-76-311;  
9 Louisiana Revised Statutes Section 14:67:18; California Penal Code  
10 Sections 332, 487, 489; Connecticut Penal Code Sections 53a-127d, 53a-  
11 35a; and Washington Penal Code Sections 9A.46.196, 9A.46.1961,  
12 9A.20.021; and

13 (2) Bribery, in violation of Indiana Code Sections 4-  
14 33-10-2 and 35-50-2-7; California Penal Code Section 641.3;  
15 Connecticut Penal Code Sections 53a-160 and 53a-35a; Nevada Revised  
16 Statutes 465.070; and Washington Criminal Code Sections 9A.68.060 and  
17 9A.20.021; and

18 b. Multiple acts indictable under the following provisions  
19 of federal law:

20 (1) Traveling in interstate and foreign commerce, and  
21 using a facility in interstate and foreign commerce, in aid of  
22 racketeering; in violation of Title 18, United States Code, Section  
23 1952;

24 (2) Laundering monetary instruments; in violation of  
25 Title 18, United States Code, Section 1956;

26 (3) Engaging in monetary transactions in property  
27 derived from specified unlawful activity; in violation of Title 18,  
28 United States Code, Section 1957;

1 (4) Obstruction of a criminal investigation; in  
2 violation of Title 18, United States Code, Section 1510;

3 (5) Tampering with a witness; in violation of Title  
4 18, United States Code, Section 1512;

5 (6) Wire fraud; in violation of Title 18, United  
6 States Code, Section 1343;

7 (7) Transporting, transmitting, and transferring in  
8 interstate and foreign commerce money of a value of \$5,000 and more,  
9 knowing the same to have been stolen, converted, and taken by fraud;  
10 in violation of Title 18, United States Code, Section 2314; and

11 (8) Receiving, possessing, concealing, storing, and  
12 disposing of money of the value of \$5,000 and more, which money  
13 crossed a state or United States boundary after being stolen,  
14 unlawfully converted, and taken, knowing the same to have been stolen,  
15 unlawfully converted, and taken; in violation of Title 18, United  
16 States Code, Section 2315.

17 7. It was further a part of the conspiracy that each defendant  
18 agreed that a conspirator would commit at least two acts of  
19 racketeering activity in the conduct of the affairs of the Enterprise.

20 **D. Manner and Means of the Enterprise**

21 8. Among the manner and means by which the members and  
22 associates of the Tran Organization conducted and participated in the  
23 conduct of the affairs of the Enterprise were the following:

24 a. It was part of the conspiracy, that after developing  
25 the card-cheating scheme, defendants TAI KHIEM TRAN, PHUONG QUOC  
26 TRUONG, and VAN THU TRAN would recruit and train other individuals to  
27 participate in the card-cheating scheme. The table games at which the  
28

1 Tran Organization usually performed the card-cheating schemes were  
2 mini-baccarat and blackjack.

3           b. It was further part of the conspiracy that the members  
4 and associates of the enterprise would usually execute the card-  
5 cheating scheme as follows: First, a member or members of the Tran  
6 Organization would recruit and bribe a dealer from a casino to perform  
7 the false shuffle, that is, to fail to shuffle or interlace cards  
8 properly after they have been dealt from the shoe, and before they are  
9 shuffled and returned to the shoe for the next round of hands. By  
10 failing to shuffle cards, the dealer would create a "slug," or group  
11 of cards in the same order that they had been dealt in the previous  
12 game. This enabled the members and associates of the enterprise to  
13 track the cards in the slug and predict the order in which they were  
14 dealt in the next game.

15           c. It was further part of the conspiracy that the members  
16 and associates of the enterprise would offer the dealer money for each  
17 successful false shuffle the dealer performed. They also would train  
18 the dealer to perform the false shuffle without being detected by  
19 casino security. Occasionally, members of the Tran Organization would  
20 also bribe casino floor supervisors and pit-bosses to assist in the  
21 card-cheating scheme.

22           d. It was further part of the conspiracy that after  
23 successfully bribing and training a dealer, several members of the  
24 Tran Organization would go to the casino and begin to play mini-  
25 baccarat or blackjack at the table where the coconspirator dealer was  
26 stationed to work. One enterprise member participated in the game as  
27 a player (the "card recorder"), who would record the values of at  
28 least a portion of the cards dealt in the regular course of play from

1 the shoe. During mini-baccarat games, the card recorder usually would  
2 record the value of the cards on a paper form the casino provided to  
3 mini-baccarat players in the normal course of play. In blackjack  
4 games, the card recorder would use a hidden transmitter or microphone  
5 and a cellular telephone to relay the order of cards to a an  
6 enterprise member or associate, who would enter the order of the cards  
7 into a computer loaded with a specially designed card tracking  
8 computer program.

9 e. It was further part of the conspiracy that after  
10 dealing all of the cards in the shoe, the dealer would create a slug  
11 of cards that a member of the Tran Organization had recorded, by the  
12 dealer performing a false shuffle.

13 f. It was further part of the conspiracy that the dealer  
14 would next place the complete deck of cards, including the slug, back  
15 into the shoe and begin dealing the next series of hands. The card  
16 recorder then would look for "indicator cards" at the start of the  
17 slug. After finding the slug, the card recorder would determine the  
18 subsequent order of cards to be played from the shoe. The card  
19 recorder then would use mini-baccarat or blackjack rules to calculate  
20 the winner of the subsequent hands. The card recorder would signal  
21 to other coconspirator players at the table to dramatically increase  
22 the size of their bets on the predicted winning hands. Typically, the  
23 players would win several successive hands during the course of one  
24 card-cheating scheme at a casino. Executing the scheme in this  
25 fashion, the Tran Organization would frequently steal approximately  
26 \$50,000 in approximately ten minutes of play. On at least one  
27 occasion, the Tran Organization stole approximately \$868,000 in  
28 approximately 1.5 hours of play by executing the card-cheating scheme.



1           g. It was further part of the conspiracy that the Tran  
2 Organization would not always succeed in winning money when they  
3 attempted to execute the card-cheating scheme. Mistakes in executing  
4 the card-cheating scheme and mistakes made by the coconspirator dealer  
5 or the card recorder would cause the Tran Organization to lose large  
6 amounts of money in a short period of time. Additionally, the Tran  
7 Organization sometimes lost bets intentionally to avoid suspicion.

8           h. It was further part of the conspiracy that after  
9 successfully cheating a casino in a blackjack or mini-baccarat game,  
10 the Tran Organization would have various members and associates cash  
11 out their gambling chips, often in amounts under \$10,000 to avoid  
12 federally regulated casino cash transaction reporting requirements.  
13 After collecting the winnings, the enterprise members and associates  
14 who participated in the game as players would typically turn over  
15 their winnings to a member of the Tran Organization, who would, in  
16 turn, pay the participating players a smaller amount of money for  
17 participating in the scheme.

18           i. It was further part of the conspiracy that the members  
19 and associates of the enterprise would bribe and attempt to bribe  
20 casino and gaming establishment employees and officials to execute the  
21 card-cheating scheme and take actions contrary to the interests of  
22 their employers.

23           j. It was further part of the conspiracy that the  
24 enterprise members and associates would travel in interstate and  
25 foreign commerce to facilitate and promote the affairs of their  
26 illegal gambling business and to promote and facilitate the bribery  
27 of casino employees and officials.

28

1           k. It was further part of the conspiracy that the  
2 enterprise members and associates would use threats and bribes to  
3 deter witnesses from informing casino and gaming establishment  
4 officials, as well as law enforcement officials, about the activities  
5 of the Enterprise and its members and associates.

6           l. It was further part of the conspiracy that the  
7 enterprise members and associates would create rules and procedures  
8 to be followed by all members and associates involved in the card-  
9 cheating schemes of the Tran Organization, in order to maximize the  
10 effectiveness of the Enterprise.

11           m. It was further part of the conspiracy that the members  
12 and associates of the enterprise would train others in the card-  
13 cheating schemes of the Enterprise and to follow the rules and  
14 procedures the defendants developed, including, but not limited to,  
15 training card dealers to perform false shuffles, training card  
16 trackers to track the order of cards as they were dealt from a shoe,  
17 and training players to follow cues as to when and how much to bet on  
18 particular hands.

19           n. It was further part of the conspiracy that the members  
20 and associates of the enterprise would scout-out casinos and gaming  
21 establishments in order to determine their level of vulnerability to  
22 the Tran Organizations card-cheating schemes.

23           o. It was further part of the conspiracy that the members  
24 and associates of the enterprise would attempt to conceal their  
25 ownership of assets by titling assets in the names of others; and

26           p. It was further part of the conspiracy that the members  
27 and associates of the enterprise would use concealed electronic  
28 transmitters and specially developed software to transmit and track

1 the order of cards during blackjack and mini-baccarat games, in order  
2 to predict and transmit to other members and associates the order of  
3 cards as they were dealt after coconspirator dealers performed false  
4 shuffles.

5 **Overt Acts**

6 1. In or about March of 2002, within the Southern District of  
7 California, defendants PHUONG QUOC TRUONG, VAN THU TRAN, and TAI KHIEM  
8 TRAN developed a false shuffle technique designed to enable them, with  
9 the assistance of corrupt casino dealers, to cheat and thereby steal  
10 money from casinos.

11 **Sycuan Resort and Casino, El Cajon, California**

12 2. On or about July 19, 2002, defendant PHUONG QUOC TRUONG  
13 performed a false shuffle at Sycuan Resort and Casino, located in El  
14 Cajon, California (hereinafter "Sycuan Casino"), that enabled  
15 coconspirators to execute the card-cheating scheme and take  
16 approximately \$525 from the casino.

17 3. On or about July 22, 2002, defendant VAN THU TRAN performed  
18 a false shuffle at the Sycuan Casino that enabled coconspirators to  
19 execute the card-cheating scheme and take approximately \$115 from the  
20 casino.

21 4. On or about July 23, 2002, defendant VAN THU TRAN performed  
22 another false shuffle at the Sycuan Casino that enabled coconspirators  
23 to execute the card-cheating scheme and take approximately \$300 from  
24 the casino.

25 5. On or about July 23, 2002, defendant VAN THU TRAN performed  
26 another false shuffle at the Sycuan Casino that enabled coconspirators  
27 to execute the card-cheating scheme and take approximately \$825 from  
28 the casino.

1       6.    On or about July 23, 2002, defendant VAN THU TRAN performed  
2 another false shuffle at the Sycuan Casino that enabled coconspirators  
3 to execute the card-cheating scheme and take approximately \$800 from  
4 the casino.

5       7.    On or about July 23, 2002, defendant VAN THU TRAN performed  
6 another false shuffle at the Sycuan Casino that enabled coconspirators  
7 to execute the card-cheating scheme and take approximately \$400 from  
8 the casino.

9                   **Agua Caliente Casino and Spa Resort Casino**  
10                   **Palm Springs, California**

11       8.    On or about August 12, 2002, in Rancho Mirage, California,  
12 defendants TAI KHIEM TRAN and ANH PHUONG TRAN offered to bribe a card  
13 dealer, whose initials are S.B., to perform false shuffles at the Agua  
14 Caliente Casino and Spa Resort Casino, Palm Springs, California  
15 (hereinafter "Agua Caliente Casino" or "Spa Resort Casino").

16       9.    On or about August 12, 2002, at a Red Roof Inn in Thousand  
17 Palms, California, in an effort to recruit card dealer S.B. to perform  
18 false shuffles at Agua Caliente Casino, defendant TAI KHIEM TRAN  
19 demonstrated the false shuffle for card dealer S.B. in the presence  
20 of defendant AHN PHUONG TRAN.

21       10.   On or about August 12, 2002, in Palm Springs, California,  
22 defendants ANH PHUONG TRAN and TAI KHIEM TRAN offered to bribe a card  
23 dealer, whose initials are N.S., to perform false shuffles at Spa  
24 Resort Casino.

25       11.   On or about August 14, 2002, in Rancho Mirage and Palm  
26 Springs, California, defendants TAI KHIEM TRAN and ANH PHUONG TRAN  
27 offered a bribe to a card dealer, whose initials are M.K., to perform  
28 false shuffles at the Agua Caliente Casino.

1        12. On or about August 14, 2002, in Palm Springs, California,  
2 defendant ANH PHUONG TRAN offered to bribe a card dealer, whose  
3 initials are Y.C., to perform false shuffles at the Spa Resort Casino.

4            **Cache Creek Indian Bingo and Casino, Brooks, California**

5        13. In or about December 2002, defendants PHUONG QUOC TRUONG and  
6 VAN THU TRAN offered to pay card dealers at the Cache Creek Indian  
7 Bingo and Casino, Brooks California (hereinafter "Cache Creek  
8 Casino"), to perform false shuffles during mini-baccarat games at  
9 Cache Creek Casino.

10       14. On or about March 9, 2003, the defendants caused a card  
11 dealer, whose initials are O.K., to perform a false shuffle at mini-  
12 baccarat table #81, at the Cache Creek Casino, creating a slug of  
13 approximately thirty cards, that enabled defendants VAN THU TRAN,  
14 PHUONG QUOC TRUONG, SON HONG JOHNSON, and HAN TRUONG NGUYEN to execute  
15 the card-cheating scheme and take approximately \$2,497 from the  
16 casino.

17       15. On or about March 9, 2003, defendant SON HONG JOHNSON cashed  
18 out gambling chips for approximately \$14,800 at the Cache Creek  
19 Casino.

20       16. On or about March 9, 2003, defendant HAN TRUONG NGUYEN  
21 cashed out gambling chips for approximately \$13,775 at the Cache Creek  
22 Casino.

23       17. On or about March 9, 2003, defendant PHUONG QUOC TRUONG  
24 cashed out gambling chips for approximately \$23,850 at the Cache Creek  
25 Casino.

26       18. On or about March 10, 2003, the defendants caused a card  
27 dealer, whose initials are L.K., to perform a false shuffle at mini-  
28 baccarat table #50, at the Cache Creek Casino, creating a slug of

1 approximately thirty-five cards, that enabled defendants VAN THU TRAN,  
2 PHUONG QUOC TRUONG, SON HONG JOHNSON, and HAN TRUONG NGUYEN to execute  
3 the card-cheating scheme and take approximately \$8,271 from the  
4 casino.

5 19. On or about March 10, 2003, defendant PHUONG QUOC TRUONG  
6 purchased gambling chips for approximately \$28,000 at the Cache Creek  
7 Casino.

8 20. On or about March 10, 2003, defendant PHUONG QUOC TRUONG  
9 cashed out gambling chips for approximately \$16,320 at the Cache Creek  
10 Casino.

11 21. On or about March 10, 2003, defendant SONG HONG JOHNSON  
12 cashed out gambling chips for approximately \$16,525 at the Cache Creek  
13 Casino.

14 22. On or about March 10, 2003, defendant HAN TRUONG NGUYEN  
15 cashed out gambling chips for approximately \$13,000 at the Cache Creek  
16 Casino.

17 23. On or about March 18, 2003, the defendants caused a card  
18 dealer, whose initials are S.M., to perform a false shuffle at mini-  
19 baccarat table #48, at the Cache Creek Casino, creating a slug of  
20 approximately fifty-one cards, that enabled defendant PHUONG QUOC  
21 TRUONG and at least one other unidentified coconspirator to execute  
22 the card-cheating scheme and take approximately \$28,534 from the  
23 casino.

24 24. On or about March 18, 2003, defendant PHUONG QUOC TRUONG  
25 purchased gambling chips for approximately \$16,200 at the Cache Creek  
26 Casino.

27

28

1       25. On or about March 18, 2003, defendant PHUONG QUOC TRUONG  
2 cashed out gambling chips for approximately \$18,050 at the Cache Creek  
3 Casino.

4       26. On or about March 25, 2003, the defendants caused card  
5 dealer S.M. to perform a false shuffle at mini-baccarat table #51, at  
6 the Cache Creek Casino, creating a slug of approximately forty-six  
7 cards, that enabled defendants PHUONG QUOC TRUONG, SON HONG JOHNSON,  
8 and other unidentified coconspirators to execute the card-cheating  
9 scheme and take approximately \$32,288 from the casino.

10       27. On or about March 25, 2003, defendant SONG HONG JOHNSON  
11 cashed out gambling chips for approximately \$17,750 at the Cache Creek  
12 Casino.

13       28. On or about March 25, 2003, defendant GEORGE MICHAEL LEE  
14 cashed out gambling chips for approximately \$12,620 at the Cache Creek  
15 Casino.

16       29. On or about March 26, 2003, defendant VAN THU TRAN flew  
17 aboard a Southwest Airlines flight from Detroit, Michigan, to San  
18 Diego, California.

19       30. On or about March 28, 2003, defendant VAN THU TRAN accessed  
20 a safety deposit box at a Bank of America branch in San Diego,  
21 California.

22       31. On or about March 29, 2003, defendant VAN THU TRAN flew  
23 aboard a Southwest Airlines flight from San Diego, California, to  
24 Sacramento, California.

25       32. On or about March 29, 2003, the defendants caused card  
26 dealer O.K. to perform a false shuffle at mini-baccarat table #51, at  
27 the Cache Creek Casino, creating a slug of approximately twenty-nine  
28 cards, that enabled defendants VAN THU TRAN and HAN TRUONG NGUYEN to

1 execute the card-cheating scheme and take approximately \$9,910 from  
2 the casino.

3 33. On or about March 30, 2003, the defendants caused card  
4 dealer O.K., to perform a false shuffle at mini-baccarat table #81,  
5 at the Cache Creek Casino, creating a slug of approximately thirty  
6 cards, that enabled defendants VAN THU TRAN, HAN TRUONG NGUYEN, and  
7 other unidentified coconspirators to execute the card-cheating scheme  
8 and take approximately \$10,883 from the casino.

9 34. On or about March 30, 2003, the defendants caused a card  
10 dealer, whose initials are N.N., to perform a false shuffle at mini-  
11 baccarat table #80, at the Cache Creek Casino, creating a slug of  
12 approximately twenty-seven cards, that enabled defendant VAN THU TRAN  
13 and other unidentified coconspirators to execute the card-cheating  
14 scheme and take approximately \$8,495 from the casino shortly after  
15 midnight on March 31, 2003.

16 35. On or about March 31, 2003, the defendants caused card  
17 dealer S.M. to perform a false shuffle at mini-baccarat table #80, at  
18 the Cache Creek Casino, creating a slug of approximately thirty-six  
19 cards, that enabled defendant VAN THU TRAN to execute the card-  
20 cheating scheme and take approximately \$9,900 from the casino.

21 36. On or about March 31, 2003, the defendants caused card  
22 dealer S.M. to perform another false shuffle at mini-baccarat table  
23 #80, at the Cache Creek Casino, creating a slug of approximately  
24 forty-seven cards, that enabled defendants VAN THU TRAN and PHUONG  
25 QUOC TRUONG to execute the card-cheating scheme and take approximately  
26 \$12,935 from the casino.

27 37. On March 31, 2003, the defendants caused card dealer N.N.  
28 to perform a false shuffle at mini-baccarat table #48, at the Cache



1 Creek Casino, creating a slug of approximately thirty-two cards, that  
2 enabled defendant VAN THU TRAN and unidentified coconspirators to  
3 execute the card-cheating scheme and take approximately \$10,346 from  
4 the casino.

5 38. On March 31, 2003, the defendants caused a card dealer,  
6 whose initials are L.K., to perform a false shuffle at mini-baccarat  
7 table #51, at the Cache Creek Casino, creating a slug of approximately  
8 thirty cards, that enabled defendant VAN THU TRAN and unidentified  
9 coconspirators to execute the card-cheating scheme and take  
10 approximately \$6,039 from the casino.

11 39. On or about March 31, 2003, defendant GEORGE MICHAEL LEE  
12 cashed out gambling chips for approximately \$18,610 at the Cache Creek  
13 Casino.

14 40. On or about January 28, 2004, defendant PHUONG QUOC TRUONG  
15 caused a Cache Creek card dealer, whose initials are R.T., to give  
16 another Cache Creek card dealer, whose initials are M.H., a \$500 money  
17 order.

18 **Casino Rama, Orillia, Ontario, Canada**

19 41. On or about October 24, 2003, at approximately 8:42 p.m.,  
20 the defendants caused a card dealer, whose initials are H.N., to  
21 perform a false shuffle at mini-baccarat table #206, at the Casino  
22 Rama in Orillia, Ontario, Canada, (hereinafter "Casino Rama"),  
23 creating a slug of thirty-three cards, that and enabled defendant TAI  
24 KHIEM TRAN and a coconspirator, whose initials are K.P., to execute  
25 the card-cheating scheme and take approximately \$6,500 (Canadian) from  
26 the casino.

1       42. Between in or about April and October 2003, defendant PHAT  
2 NGOC TRAN took approximately \$404,900 (Canadian) from Casino Rama  
3 through the execution of the card-cheating scheme.

4       43. Between in or about April and October 2003, coconspirator  
5 Khai Hong Tran took approximately \$807,382 (Canadian) from Casino Rama  
6 through the execution of the card-cheating scheme.

7       44. Between in or about April and October 2003, defendant TAI  
8 KHIEM TRAN took approximately \$448,900 (Canadian) from Casino Rama  
9 through the execution of the card-cheating scheme.

10       45. Between in or about April and October 2003, the defendants  
11 caused a coconspirator, whose initials are V.T.K., to take  
12 approximately \$95,100 (Canadian) from Casino Rama through the  
13 execution of the card-cheating scheme.

14       46. Between in or about April and October 2003, the defendants  
15 caused a coconspirator, whose initials are R.S., to take approximately  
16 \$194,400 (Canadian) from Casino Rama through the execution of the  
17 card-cheating scheme.

18       47. Between in or about April and October 2003, the defendants  
19 caused a coconspirator, whose initials are J.M., to take approximately  
20 \$159,000 (Canadian) from Casino Rama through the execution of the  
21 card-cheating scheme.

22       48. Between in or about April and October 2003, the defendants  
23 caused a coconspirator, whose initials are K.P., to take approximately  
24 \$89,845 (Canadian) from Casino Rama through the execution of the card-  
25 cheating scheme.

26       49. On or about September 3, 2003, defendant TAI KHIEM TRAN wire  
27 transferred approximately \$150,000 (U.S.) from Toronto Dominion Bank,  
28 Toronto, Canada, to Marco Polo Travel Tours in Houston, Texas.

1        50. On or about September 24, 2003, defendant PHAT NGOC TRAN  
2 wire transferred approximately \$49,940 (U.S.) from Toronto Dominion  
3 Bank, Toronto, Canada, to defendant TAI KHIEM TRAN's Washington Mutual  
4 bank account in El Cajon, California.

5        51. On or about October 1, 2003, defendant TAI KHIEM TRAN wire  
6 transferred approximately \$70,000 (U.S.) from Toronto Dominion Bank,  
7 Toronto, Canada, to Fab Tech Inc., Houston, Texas.

8        52. On or about October 10, 2003, defendant TAI KHIEM TRAN wire  
9 transferred approximately \$70,000 (U.S.) from Toronto Dominion Bank,  
10 Toronto, Canada, to Fab Tech Inc., Houston, Texas.

11       53. On or about October 17, 2003, defendant PHAT NGOC TRAN wire  
12 transferred approximately \$64,925 (U.S.) from Toronto Dominion Bank,  
13 Toronto, Canada, to defendant TAI KHIEM TRAN's Washington Mutual bank  
14 account in El Cajon, California.

15       54. On or about October 22, 2003, defendant TAI KHIEM TRAN wire  
16 transferred approximately \$80,000 (U.S.) from Toronto Dominion Bank,  
17 Toronto, Canada, to Fab Tech Inc., Houston, Texas.

18       55. On or about December 10, 2003, defendant PHAT NGOC TRAN wire  
19 transferred approximately \$21,600 (U.S.) from Toronto Dominion Bank,  
20 Toronto, Canada, to defendant TAI KHIEM TRAN's Washington Mutual bank  
21 account in El Cajon, California.

22       56. On or about January 13, 2004, defendant PHAT NGOC TRAN wire  
23 transferred approximately \$16,800 (U.S.) from Toronto Dominion Bank,  
24 Toronto, Canada, to defendant TAI KHIEM TRAN's Washington Mutual bank  
25 account in El Cajon, California.

26                    **Emerald Queen Casino, Tacoma, Washington**

27       57. In or about April 2003, defendants PHUONG QUOC TRUONG and  
28 VAN THU TRAN recruited two card dealers, whose initials are C.N. and

1 R.J., from the Emerald Queen Casino in Deming, Washington (hereinafter  
2 "Emerald Queen Casino"), and offered to bribe them to perform false  
3 shuffles.

4 58. On or about April 23, 2003, defendant VAN THU TRAN agreed  
5 to bribe Emerald Queen Casino card dealer R.J., by paying R.J. \$3,000  
6 to travel to San Diego, California, where defendant VAN THU TRAN would  
7 show R.J. how to cheat at the game of mini-baccarat through the false  
8 shuffle.

9 59. On or about April 25, 2003, defendant VAN THU TRAN purchased  
10 a round trip plane ticket for card dealer R.J., to travel from  
11 Washington State to San Diego, California, from April 28 through April  
12 29, 2003.

13 60. On or about April 28, 2003, defendant VAN THU TRAN caused  
14 card dealer R.J. to fly aboard Alaska Airlines flight 570, from  
15 Seattle, Washington, to San Diego, California, for the purpose of  
16 training R.J. to perform the false shuffle.

17 61. On April 28, 2003, defendants PHUONG QUOC TRUONG and VAN THU  
18 TRAN picked up card dealer R.J. at the airport in San Diego,  
19 California, and drove R.J. to their home at 1361 Surfwood Lane, San  
20 Diego, California.

21 62. On April 28, 2003, at 1361 Surfwood Lane, San Diego,  
22 California, in the presence of defendants PHUONG QUOC TRUONG and  
23 GEORGE MICHAEL LEE, defendant VAN THU TRAN demonstrated for card  
24 dealer R.J., the false shuffle that they wanted R.J. to perform on a  
25 mini-baccarat table at the Emerald Queen Casino.

26 63. On or about April 28, 2003, at 1361 Surfwood Lane, San  
27 Diego, California, defendant VAN THU TRAN bribed card dealer R.J., by  
28 paying R.J. approximately \$3,000 in cash.

1       64. On or about May 1, 2003, defendant VAN THU TRAN flew from  
2 San Diego, California, to Seattle, Washington, aboard Alaska Airlines  
3 Flight 545, for the purpose of executing the card-cheating scheme at  
4 the Emerald Queen Casino with the assistance of a card dealer R.J.,  
5 and for the purpose of bribing additional card dealers to perform the  
6 false shuffle.

7       65. In or about May 2003, defendants PHUONG QUOC TRUONG and VAN  
8 THU TRAN caused a coconspirator, whose initials are N.N., to recruit  
9 a card dealer, whose initials are C.N., to perform the false shuffle  
10 during mini-baccarat games at the Emerald Queen Casino.

11       66. In or about May 2003, defendants VAN THU TRAN and PHUONG  
12 QUOC TRUONG offered to bribe a card dealer C.N., by paying C.N. \$1,000  
13 per day to perform two false shuffles per day at the Emerald Queen  
14 Casino.

15       67. On several occasions, beginning in or about June 2003, and  
16 continuing through in or about August 2003, the defendants caused card  
17 dealer C.N. to perform false shuffles at mini-baccarat tables at the  
18 Emerald Queen Casino, that enabled defendants PHUONG QUOC TRUONG, VAN  
19 THU TRAN, SON HONG JOHNSON, HA THUY GIANG, MARTIN LEE ARONSON, HAN  
20 TRUONG NGUYEN, and other coconspirators to execute the card-cheating  
21 scheme and take money from the casino.

22       68. Between in or about June 2003 and in or about August 2003,  
23 PHUONG QUOC TRUONG bribed card dealer C.N., by paying C.N.  
24 approximately \$14,000 to perform false shuffles at the Emerald Queen  
25 Casino.

26       69. On or about July 14, 2003, defendant PHUONG QUOC TRUONG  
27 caused card dealer C.N. to rent a house located at 3815 S. Cushman  
28 Avenue, Tacoma, Washington, that was used by defendant PHUONG QUOC

1 TRUONG and his associates in the Tran Organization as a base of  
2 operations while executing the card-cheating scheme at the Emerald  
3 Queen Casino.

4 70. On or about September 15, 2003, defendants PHUONG QUOC  
5 TRUONG, SON HONG JOHNSON, HAN TRUONG NGUYEN, and at least one other  
6 coconspirator flew from San Diego, California, to Seattle, Washington,  
7 aboard an Alaska Airlines flight, for the purpose of executing the  
8 card-cheating scheme at the Emerald Queen Casino.

9 71. On or about September 17, 2003, shortly after midnight,  
10 defendant PHUONG QUOC TRUONG cashed out gambling chips for  
11 approximately \$30,078 at the Emerald Queen Casino.

12 72. On or about September 17, 2003, defendant PHUONG QUOC TRUONG  
13 purchased gambling chips for approximately \$10,000 at the Emerald  
14 Queen Casino.

15 73. On or about September 17, 2003, defendant MARTIN LEE ARONSON  
16 tracked the order of cards as they were dealt at mini-baccarat tables  
17 #1 and #3, at the Emerald Queen Casino, in preparation for executing  
18 the card-cheating scheme.

19 74. On or about September 17, 2003, the defendants caused a card  
20 dealer, whose initials are P.N., to perform a false shuffle at mini-  
21 baccarat table #3, at the Emerald Queen Casino, creating a slug that  
22 enabled defendants PHUONG QUOC TRUONG and MARTIN LEE ARONSON to  
23 execute the card-cheating scheme and take approximately \$72,000 from  
24 the casino.

25 75. On or about September 17, 2003, the defendants caused a card  
26 dealer, whose initials are T.S., to perform a false shuffle at mini-  
27 baccarat table #1, at the Emerald Queen Casino, creating a slug that  
28 enabled defendants PHUONG QUOC TRUONG and MARTIN LEE ARONSON to

1 execute the card-cheating scheme and take approximately \$37,500 from  
2 the casino.

3 76. On or about September 17, 2003, defendant PHUONG QUOC TRUONG  
4 cashed out gambling chips for approximately \$100,080 at the Emerald  
5 Queen Casino.

6 77. In or about early October, 2003, the defendants caused two  
7 card dealers, whose initials are C.N. and P.P., to fly from Seattle,  
8 Washington, to San Diego, California, to meet with defendants PHUONG  
9 QUOC TRUONG and VAN THU TRAN at their home at 1361 Surfwood Lane, San  
10 Diego, California.

11 78. In or about early October, 2003, defendant PHUONG QUOC  
12 TRUONG asked card dealers C.N. and P.P. to travel to Mississippi to  
13 scout-out a casino and determine if it was vulnerable to the card-  
14 cheating scheme.

15 79. On or about October 13, 2003, the defendants caused card  
16 dealers C.N. and P.P., to travel from San Diego, California, to  
17 Choctaw, Mississippi, where they scouted-out the Golden Moon Casino,  
18 which is owned and operated by the Mississippi Band of Choctaw  
19 Indians, to see if it was vulnerable to the card-cheating scheme.

20 80. On or about October 22, 2003, defendants PHUONG QUOC TRUONG,  
21 SON HONG JOHNSON, MARTIN LEE ARONSON, HA THUY GIANG, HAN TRUONG  
22 NGUYEN, and another coconspirator, whose initials are H.H., flew from  
23 San Diego, California, to Seattle, Washington, for the purpose of  
24 executing the card-cheating scheme at the Emerald Queen Casino.

25 81. From on or about October 23, 2003, at approximately 11:00  
26 p.m., through on or about October 24, 2003, at approximately 2:00  
27 a.m., defendant MARTIN LEE ARONSON tracked the order of cards as they  
28



1 were dealt at mini-baccarat tables #1 and #3, at the Emerald Queen  
2 Casino, in preparation for executing the card-cheating scheme.

3 82. On or about October 24, 2003, shortly after midnight, the  
4 defendants caused card dealer T.S. to perform a false shuffle at mini-  
5 baccarat table #1, at the Emerald Queen Casino, that enabled  
6 defendants HA THUY GIANG and MARTIN LEE ARONSON to execute the card-  
7 cheating scheme and take approximately \$17,500 and \$2,650,  
8 respectively, from the casino.

9 83. On or about October 24, 2003, shortly after midnight, the  
10 defendants caused card dealer P.N. to perform a false shuffle at mini-  
11 baccarat table #3, at the Emerald Queen Casino, creating a slug that  
12 enabled defendants SON HONG JOHNSON and MARTIN LEE ARONSON to execute  
13 the card-cheating scheme and take approximately \$2,000 from the  
14 casino.

15 84. On or about October 24, 2003, at approximately 2:13 a.m.,  
16 defendant HA THUY GIANG cashed out gambling chips for approximately  
17 \$7,000 at the Emerald Queen Casino.

18 85. On or about October 24, 2003, at approximately 2:18 a.m.,  
19 defendant SON HONG JOHNSON cashed out gambling chips for approximately  
20 \$4,200 at the Emerald Queen Casino.

21 86. On or about October 24, 2003, at approximately 1:39 p.m.,  
22 defendant HA THUY GIANG cashed out gambling chips for approximately  
23 \$8,000 at the Emerald Queen Casino.

24 87. On or about October 24, 2003, at approximately 1:59 p.m.,  
25 defendant SON HONG JOHNSON cashed out gambling chips for approximately  
26 \$3,000 at the Emerald Queen Casino.

27 88. On or about the evening of October 24, 2003, defendant  
28 MARTIN LEE ARONSON tracked the order of cards as they were dealt at



1 mini-baccarat tables #2 and #3, at the Emerald Queen Casino, in  
2 preparation for executing the card-cheating scheme.

3 89. On or about October 24, 2003, the defendants caused card  
4 dealer T.S. to perform a false shuffle at mini-baccarat table #3, at  
5 the Emerald Queen Casino, creating a slug that enabled defendants SON  
6 HONG JOHNSON and MARTIN LEE ARONSON to execute the card-cheating  
7 scheme and take approximately \$19,500 from the casino.

8 90. On or about October 24, 2003, the defendants caused card  
9 dealer P.N. to perform a false shuffle at mini-baccarat table #2, at  
10 the Emerald Queen Casino, creating a slug that enabled defendants HA  
11 THUY GIANG and MARTIN LEE ARONSON to execute the card-cheating scheme  
12 and take approximately \$11,500 from the casino.

13 91. On or about October 24, 2003, defendant SON HONG JOHNSON  
14 cashed out gambling chips for approximately \$17,500 at the Emerald  
15 Queen Casino.

16 92. On or about October 24, 2003, defendant HA THUY GIANG cashed  
17 out gambling chips for approximately \$7,550 at the Emerald Queen  
18 Casino.

19 **Defendant PHUONG QUOC TRUONG's Purchase of**  
20 **2005 Mercedes Benz**

21 93. On or about July 14, 2004, defendant PHUONG QUOC TRUONG  
22 caused a coconspirator, whose initials are D.N., to purchase a 2005  
23 Mercedes Benz with personalized California license plate "PGJOHN" for  
24 \$101,530.

25 94. On or about July 7, 2005, defendant PHUONG QUOC TRUONG  
26 caused coconspirator D.N. to add defendant PHUONG QUOC TRUONG to the  
27 title of the 2005 Mercedes Benz.

28

**Caesars Indiana Casino, Elizabeth, Indiana**

95. On or about July 26 and 27, 2004, between the hours of approximately 11:00 p.m. and 12:42 a.m., the defendant's caused a card dealer, whose initials are C.S., to perform a false shuffle at mini-baccarat table #202, pit #8, at the Caesars Indiana Hotel and Casino, in Elizabeth, Indiana (hereinafter "Caesars Indiana Casino"), creating a slug that enabled a coconspirator, whose initials are H.V.T., an unidentified coconspirator, and another Tran Organization associate, whose initials are A.B., to execute the card-cheating scheme and take approximately \$21,000 from the casino.

96. On or about July 27, 2004, the defendants caused Tran Organization associate A.B. to cash out gambling chips for approximately \$1,500 at the Caesars Indiana Casino.

97. On or about July 27, 2004, the defendants caused coconspirator H.V.T. to cash out gambling chips for approximately \$1,800 at the Caesar's Indiana Casino.

98. On or about July 27, 2004, the defendants caused an unidentified coconspirator to cash out gambling chips for approximately \$955 at the Caesars Indiana Casino.

99. On or about July 27, 2004, the defendants caused Tran Organization associate A.B. to again cash out gambling chips for approximately \$1,500 at the Caesars Indiana Casino.

100. On or about July 27, 2004, the defendants caused Tran Organization associate A.B. to again cash out gambling chips for approximately \$1,500 at the Caesars Indiana Casino.

1        101. On or about July 27, 2004, the defendants caused Tran  
2 Organization associate A.B. to again cash out gambling chips for  
3 approximately \$1,500 at the Caesars Indiana Casino.

4        102. On or about July 27, 2004, the defendants caused Tran  
5 Organization associate A.B. to again cash out gambling chips for  
6 approximately \$1,500 at the Caesars Indiana Casino.

7        103. On or about August 2, 2004, between approximately 6:51 p.m.  
8 and 6:57 p.m., coconspirator John Tran tracked the order of cards as  
9 they were dealt by card dealer C.S. at mini-baccarat table #202, at  
10 Caesars Indiana Casino, in preparation for executing the card-cheating  
11 scheme.

12        104. On or about August 2, 2004, at approximately 7:43 p.m., the  
13 defendants caused card dealer C.S. to perform a false shuffle at mini-  
14 baccarat table #202, at Caesars Indiana Casino.

15        105. On or about August 2, 2004, between the approximately 7:54  
16 p.m. and 8:00 p.m., coconspirator John Tran tracked the order of cards  
17 as they were dealt by card dealer C.S., at mini-baccarat table #202,  
18 at Caesars Indiana Casino, in preparation for executing the card-  
19 cheating scheme.

20        106. On or about August 2, 2004, between approximately 9:16 p.m.  
21 and 9:32 p.m., the defendants caused card dealer C.S. to perform a  
22 false shuffle at mini-baccarat table #202, at Caesars Indiana Casino,  
23 in an attempt to enable defendant HA THUY GIANG and coconspirators  
24 Khai Hong Tran, John Tran, and H.V.T., and Tran Organization associate  
25 A.B. to execute the card-cheating scheme.

**Beau Rivage Casino, Biloxi, Mississippi**

107. In or about September 2004, the defendants caused a coconspirator, whose initials are J.O., to recruit a Beau Rivage Casino, Biloxi, Mississippi (hereinafter "Beau Rivage Casino"), card dealer, whose initials are S.N., to perform false shuffles.

108. On or about October 7, 2004, defendant PHUONG QUOC TRUONG purchased gambling chips for approximately \$21,500 at the Beau Rivage Casino.

109. On or about October 7, 2004, the defendants caused a card dealer, whose initials are J.R., to perform a false shuffle at blackjack table #17, pit #1, at the Beau Rivage Casino, creating a slug of approximately twenty-four cards, that enabled defendants PHUONG QUOC TRUONG, SON HONG JOHNSON, VAN THU TRAN, GEORGE MICHAEL LEE, and two coconspirators to execute the card-cheating scheme and take approximately \$16,200 from the casino.

110. On or about October 7, 2004, defendant PHUONG QUOC TRUONG cashed out gambling chips for approximately \$35,500 at the Beau Rivage Casino.

111. On or about February 4, 2005, the defendants caused card dealer S.N. to perform a false shuffle at blackjack table #13, pit #1, at the Beau Rivage Casino, creating a slug of approximately fifty-one cards, that enabled defendants TIEN DUC VU, PHAT NGOC TRAN, WILLY TRAN, two coconspirators, whose initials are E.I. and M.M., and at least two other unidentified coconspirators, to execute the card-cheating scheme and take approximately \$56,100 from the casino.

112. On or about February 4, 2005, defendant TIEN DUC VU cashed out gambling chips for approximately \$66,000 at the Beau Rivage Casino.

1 113. On or about December 17, 2005, defendant PHUONG QUOC TRUONG  
2 telephoned card dealer S.N. and offered to bribe S.N. by paying S.N.  
3 \$15,000 to \$20,000 to perform false shuffles at a casino in the Gulf  
4 Coast, Mississippi area.

5 **Defendant VAN THU TRAN's Purchase of**  
6 **Hidden Transmitter Device**

7 114. On or about October 15, 2004, defendant VAN THU TRAN wire  
8 transferred approximately \$1,022.44 from San Diego, California, to  
9 Toronto, Canada, to purchase a wireless transmitting device from the  
10 Spy Shops of the U.S. and Canada, for the purpose of secretly  
11 transmitting the order of cards dealt during card games.

12 115. On or about October 15, 2004, defendant VAN THU TRAN sent  
13 a second wire transfer of approximately \$850 to the Spy Shops of the  
14 U.S. and Canada.

15 **Palace Station Hotel and Casino, Las Vegas, Nevada**

16 116. On or about December 8, 2004, in preparation for executing  
17 the card-cheating scheme, defendant PHAT NGOC TRAN recorded the order  
18 of cards as they were dealt at mini-baccarat table #7, at the Palace  
19 Station Casino.

20 117. On or about December 8, 2004, the defendants caused a  
21 dealer, whose initials are T.V.N., to perform a false shuffle at mini-  
22 baccarat table #7, at the Palace Station Casino, creating a slug that  
23 enabled defendant PHAT NGOC TRAN and three coconspirators, whose  
24 initials are H.T.V., R.M., and T.V.L., to execute the card-cheating  
25 scheme and take approximately \$18,237 from the casino.

26 **Foxwoods Resort Casino, Ledyard, Connecticut**

27 118. In or about early January 2005, defendant PHAT NGOC TRAN  
28 recruited a card dealer, whose initials are J.F., to perform false

1 shuffles at the Foxwoods Resort Casino in Ledyard, Connecticut  
2 (hereinafter "Foxwoods Casino").

3 119. On or about the next day in early January 2005, defendant  
4 PHAT NGOC TRAN met with card dealer J.F. and bribed J.F. by paying  
5 J.F. \$500 in cash and telling J.F. that he wanted J.F. to work for  
6 him.

7 120. On or about the next day in early January 2005, in the  
8 presence of defendants WILLY TRAN and PHUONG QUOC TRUONG, and  
9 coconspirator Tuan Mong Le, defendant PHAT NGOC TRAN demonstrated the  
10 false shuffle to card dealer J.F. in a hotel room.

11 121. On or about the next day in early January 2005, in the  
12 presence of defendants WILLY TRAN and PHUONG QUOC TRUONG, and  
13 coconspirator Tuan Mong Le, defendant PHAT NGOC TRAN bribed card  
14 dealer J.F., by paying him \$500 in cash in a hotel room and  
15 instructing J.F. to practice the false shuffle so that defendant PHAT  
16 NGOC TRAN and his associates could execute the card-cheating scheme  
17 at Foxwoods Casino in the future.

18 122. On or about March 24, 2005, at approximately 9:27 p.m.,  
19 defendant BARRY WELLFORD performed a false shuffle at blackjack table  
20 #16, pit #20, at Foxwoods Casino, creating a slug of approximately  
21 sixty-eight cards, that enabled coconspirator Duc Cong Nguyen to  
22 execute the card-cheating scheme and take approximately \$91,100 from  
23 the casino.

24 123. On or about March 24, 2005, coconspirator Duc Cong Nguyen  
25 cashed out gambling chips for approximately \$95,600 at Foxwoods  
26 Casino.

27 124. On or about March 26, 2005, at approximately 10:12 p.m., the  
28 defendants caused card dealer J.F. to perform a false shuffle at

1 blackjack table #12, pit #20, at Foxwoods Casino, creating a slug of  
2 approximately ninety-two cards, that enabled defendant HAN TRUONG  
3 NGUYEN to execute the card-cheating scheme and take approximately  
4 \$29,000 from the casino.

5 125. On or about March 26, 2005, defendant HAN TRUONG NGUYEN  
6 cashed out gambling chips for approximately \$38,100 at Foxwoods  
7 Casino.

8 126. On or about March 28, 2005, at approximately 9:32 p.m., the  
9 defendants caused card dealer J.F. to perform a false shuffle at  
10 blackjack table #6, pit #20, at Foxwoods Casino, creating a slug of  
11 approximately eighty-one cards, that enabled defendant HAN TRUONG  
12 NGUYEN to execute the card-cheating scheme and take approximately  
13 \$68,000 from the casino.

14 127. On or about March 28, 2005, defendant HAN TRUONG NGUYEN  
15 cashed out gambling chips for approximately \$78,115 at Foxwoods  
16 Casino.

17 128. On or about March 31, 2005, at approximately 11:03 p.m.,  
18 defendant BARRY WELLFORD performed a false shuffle at blackjack table  
19 #23, pit #20, at Foxwoods Casino, creating a slug of approximately  
20 seventy-six cards, that enabled defendant SON HONG JOHNSON to execute  
21 the card-cheating scheme and take approximately \$40,800 from the  
22 casino.

23 129. On or about March 31, 2005, defendant SON HONG JOHNSON  
24 cashed out gambling chips for approximately \$48,290 at Foxwoods  
25 Casino.

26 130. On or about April 4, 2005, at approximately 3:41 a.m., the  
27 defendants caused card dealer J.F. to performed a false shuffle at  
28 blackjack table #11, pit #20, at Foxwoods Casino, creating a slug of

1 approximately fifty-nine cards, that enabled defendant TIEN DUC VU to  
2 execute the card-cheating scheme and take approximately \$21,000 from  
3 the casino.

4 131. On or about April 4, 2005, defendant TIEN DUC VU cashed out  
5 gambling chips for approximately \$31,000 at Foxwoods Casino.

6 132. On or about April 5, 2005, at approximately 2:54 a.m.,  
7 defendant BARRY WELLFORD performed a false shuffle at blackjack table  
8 #14, pit #20, at Foxwoods Casino, creating a slug of approximately one  
9 hundred and three cards, that enabled defendant HAN TRUONG NGUYEN to  
10 execute the card-cheating scheme and take approximately \$50,000 from  
11 the casino.

12 133. On or about April 5, 2005, defendant HAN TRUONG NGUYEN  
13 cashed out gambling chips for approximately \$59,200 at the Foxwoods  
14 Casino.

15 134. On or about April 5, 2005, at approximately 3:50 a.m., the  
16 defendants caused card dealer J.F. to perform a false shuffle at  
17 blackjack table #11, pit #20, at Foxwoods Casino, creating a slug of  
18 approximately eighty-nine cards, that enabled coconspirator Duc Cong  
19 Nguyen to execute the card-cheating scheme and take approximately  
20 \$24,500 from the casino.

21 135. On or about April 5, 2005, coconspirator Duc Cong Nguyen  
22 cashed out gambling chips for approximately \$30,750 at Foxwoods  
23 Casino.

24 136. On or about April 15, 2005, at approximately 3:34 a.m.,  
25 defendant BARRY WELLFORD performed a false shuffle at blackjack table  
26 #11, pit #20, at Foxwoods Casino, creating a slug of approximately  
27 eighty-six cards, that enabled coconspirator Tuan Mong Le to execute  
28



1 the card-cheating scheme and take approximately \$23,000 from the  
2 casino.

3 137. On or about April 15, 2005, coconspirator Tuan Mong Le  
4 cashed out gambling chips for approximately \$70,150 at Foxwoods  
5 Casino.

6 138. On or about April 16, 2005, at approximately 11:11 p.m., the  
7 defendants caused card dealer J.F. to perform a false shuffle at  
8 blackjack table #7, pit #20, at Foxwoods Casino, creating a slug of  
9 approximately seventy-eight cards, that enabled coconspirator Tuan  
10 Mong Le to execute the card-cheating scheme and take approximately  
11 \$60,500 from the casino.

12 139. On or about April 17, 2005, at approximately 3:48 a.m.,  
13 defendant BARRY WELLFORD performed a false shuffle at blackjack table  
14 #23, pit #20, at Foxwoods Casino, creating a slug of approximately one  
15 hundred cards, that enabled defendant TIEN DUC VU to execute the card-  
16 cheating scheme and take approximately \$52,300 from the casino.

17 140. On or about April 18, 2005, at approximately 1:54 a.m.,  
18 defendant BARRY WELLFORD performed a false shuffle at blackjack table  
19 #19, pit #20, at Foxwoods Casino, creating a slug of approximately  
20 ninety-two cards that enabled defendant SON HONG JOHNSON to execute  
21 the card-cheating scheme and take approximately \$18,500 from the  
22 casino.

23 141. On or about April 18, 2005, defendant SON HONG JOHNSON  
24 cashed out gambling chips for approximately \$26,650 at Foxwoods  
25 Casino.

26 142. On or about April 19, 2005, at approximately 12:51 a.m., the  
27 defendants caused card dealer J.F., to perform a false shuffle at  
28

1 blackjack table #5, pit #20, at Foxwoods Casino, creating a slug of  
2 approximately eighty-eight cards, that enabled defendant MARTIN LEE  
3 ARONSON to execute the card-cheating scheme and take approximately  
4 \$66,200 from the casino.

5 143. On or about April 19, 2005, defendant MARTIN LEE ARONSON  
6 cashed out gambling chips for approximately \$72,100 at Foxwoods  
7 Casino.

8 **Barona Valley Ranch Resort and Casino, Lakeside California**

9 144. On or about April 7, 2005, defendant ANH PHUONG TRUONG  
10 offered to bribe a card dealer, whose initials are P.L., of the Barona  
11 Valley Ranch Resort and Casino, located in Lakeside, California,  
12 within the Southern District of California (hereinafter "Barona  
13 Casino"), to perform false shuffles during mini-baccarat and blackjack  
14 games.

15 145. In or about April 2005, in San Diego, California, defendant  
16 TAI KHIEM TRAN and two coconspirators, one of whose initials are D.D.,  
17 offered to bribe a Barona Casino card dealer, whose initials are M.L.,  
18 by paying him \$5,000 for each false shuffle that he performed in  
19 furtherance of the card-cheating scheme.

20 146. On or about April 20, 2005, defendant TAI KHIEM TRAN,  
21 accompanied by coconspirator D.D., demonstrated the false shuffle for  
22 card dealer M.L. at an apartment in San Diego, California.

23 147. On or about May 24, 2005, defendant TAI KHIEM TRAN bribed  
24 a Barona Casino card dealer, whose initials are C.S., by paying C.S.  
25 approximately \$10,000 for performing the false shuffle in furtherance  
26 of the card-cheating scheme.

27

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1       148. On or about June 5, 2005, a coconspirator attempted to bribe  
2 a floor supervisor at the Barona Casino to find a card dealer to  
3 perform false shuffles.

4       149. On or about June 6, 2005, at approximately 5:22 a.m., the  
5 defendants caused a card dealer, whose initials are J.R., to perform  
6 a false shuffle at mini baccarat table #171, at Barona Casino,  
7 creating a slug of approximately thirty-nine cards that enabled  
8 defendant TAI KHIEM TRAN and two coconspirators, whose initials are  
9 D.D. and J.H., to execute the card-cheating scheme and take  
10 approximately \$72,300 from the casino.

11       150. On or about June 6, 2005, defendant TAI KHIEM TRAN  
12 telephoned card dealer M.L. and left a message on his voice mail  
13 asking if he was "ready" to perform the false shuffle at Barona  
14 Casino.

15       151. On or about June 6, 2005, at approximately 6:47 p.m., the  
16 defendants caused card dealer C.S. to fail to shuffle a portion of the  
17 deck of cards at mini-baccarat table #162, at Barona Casino, creating  
18 a slug that enabled defendant TAI KHIEM TRAN and coconspirator D.D.  
19 to execute the card-cheating scheme and take approximately \$44,700  
20 from the casino.

21       152. On or about June 6, 2005, at approximately 7:54 p.m.,  
22 defendant TAI KHIEM TRAN cashed out gambling chips for approximately  
23 \$19,100 at Barona Casino.

24       153. On or about June 6, 2005, at approximately 8:01 p.m., a  
25 coconspirator, whose initials are J.H., cashed out gambling chips for  
26 approximately \$9,700 at Barona Casino.

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154. On or about June 6, 2005, at approximately 8:01 p.m., coconspirator J.H. again cashed out gambling chips for approximately \$9,700 at Barona Casino.

155. On or about June 6, 2005, at approximately 8:45 p.m., coconspirator J.H. again cashed out gambling chips for approximately \$5,000 at Barona Casino.

156. On or about June 9, 2005, defendant TAI KHIEM TRAN made a \$40,000 payment to Saxon Mortgage for his home loan on 10021 Resmar Court, La Mesa, California.

157. On or about June 17, 2005, the defendants caused card dealer M.L. to perform a false shuffle at mini-baccarat table #145, at Barona Casino, creating a slug of cards that enabled defendant TAI KHIEM TRAN, coconspirator Nam Van To, and a coconspirator, whose initials are A.V., and other unidentified coconspirators to execute the card-cheating scheme and take approximately \$40,215 from the casino.

158. On or about June 18, 2005, at approximately 4:06 a.m., the defendants caused card dealer J.R. to perform a false shuffle at mini-baccarat table #171, at Barona Casino, in an attempt to create a slug that would enable coconspirator D.D. and other unidentified coconspirators to execute the card-cheating scheme and take money from the casino.

159. On or about June 18, 2005, at approximately 6:10 a.m., the defendants caused card dealer J.R. to fail to shuffle an entire deck of cards at mini-baccarat table #171, at Barona Casino, creating a slug of approximately 376 cards, that enabled defendant TAI KHIEM TRAN coconspirator Nam Van To, and a coconspirator, whose initials are

1 A.V., to execute the card-cheating scheme and take approximately  
2 \$54,000 from the casino.

3 160. On or about June 18, 2005, at approximately 7:25 a.m.,  
4 defendant TAI KHIEM TRAN cashed out gambling chips for approximately  
5 \$9,600 at Barona Casino.

6 161. On or about June 18, 2005, at approximately 7:39 a.m.,  
7 coconspirator A.V. cashed out gambling chips for approximately \$22,915  
8 at Barona Casino.

9 162. On or about June 19, 2005, in San Diego, California,  
10 defendant TAI KHIEM TRAN bribed Barona Casino card dealers M.L. and  
11 J.R. for performing false shuffles in furtherance of the card-cheating  
12 scheme.

13 163. On or about June 22, 2005, defendant ANH PHUONG TRAN  
14 telephoned Barona Casino card dealer M.L. and offered him a job and  
15 money to prevent him from telling law enforcement and casino  
16 authorities about the false shuffle card-cheating scheme.

17 164. On or about June 24, 2005, in the Southern District of  
18 California, defendants TAI KHIEM TRAN and ANH PHUONG TRAN bribed  
19 Barona Casino dealers M.L., J.R., and C.S. with approximately \$3,000  
20 in an attempt to prevent them from telling law enforcement and casino  
21 authorities about the false shuffle card-cheating scheme.

22 **Sycuan Resort and Casino, El Cajon, California**

23 165. On or about June 4, 2005, defendant ANH PHUONG TRAN  
24 attempted to recruit a dealer from the Sycuan Resort and Casino in El  
25 Cajon, California, to assist in the card-cheating scheme, telling the  
26 dealer that he/she would make "one hundred thousand" dollars.



**L'Auberge du Lac Hotel and Casino, Lake Charles, Louisiana**

166. On or about August 3, 2005, defendant GEORGE MICHAEL LEE cashed out gambling chips for approximately \$35,100 at the L'Auberge du Lac Hotel and Casino in Lake Charles, Louisiana (hereinafter "L'Auberge Casino").

167. On or about August 3, 2005, the defendants caused a coconspirator, whose initials are U.S.W., to purchase approximately \$4,000 in gambling chips at L'Auberge Casino.

168. On or about August 3, 2005, defendant HAN TRUONG NGUYEN purchased approximately \$10,900 in gambling chips at L'Auberge Casino.

169. On or about August 3, 2005, defendant GEORGE MICHAEL LEE purchased approximately \$15,000 in gambling chips at L'Auberge Casino.

170. On or about August 3, 2005, the defendants caused a card dealer, whose initials are F.B., to perform a false shuffle at mini-baccarat table #404, at L'Auberge Casino, creating a slug of approximately eighty-eight cards, that enabled defendants GEORGE MICHAEL LEE, TIEN DUC VU, and HAN TRUONG NGUYEN, and coconspirator U.S.W. to execute the card-cheating scheme and take approximately \$427,820 from the casino.

171. On or about August 3, 2005, defendant HAN TRUONG NGUYEN cashed out gambling chips for approximately \$89,320 at L'Auberge Casino.

172. On or about August 3, 2005, defendant TIEN DUC VU cashed out gambling chips for approximately \$136,300 at L'Auberge Casino.

173. On or about August 3, 2005, defendant GEORGE MICHAEL LEE cashed out gambling chips for approximately \$165,000 at L'Auberge Casino.

1 174. On or about August 3, 2005, coconspirator U.S.W. cashed out  
2 gambling chips for approximately \$37,200 at L'Auberge Casino.

3 175. On or about August 4, 2005, defendants GEORGE MICHAEL LEE,  
4 TIEN DUC VU, and HAN TRUONG NGUYEN, and coconspirator U.S.W flew from  
5 Louis Armstrong Airport, New Orleans, Louisiana, to San Diego,  
6 California, aboard Southwest Airlines Flight 1352.

7 **Morongo Casino Resort and Spa, Cabazan, California**

8 176. On or about September 2005, defendants GEORGE MICHAEL LEE  
9 and TIEN DUC VU attempted to recruit a dealer at Morongo Casino Resort  
10 and Spa in Cabazan, California, to perform false shuffles in  
11 furtherance of the card-cheating scheme.

12 **Nooksack River Casino, Deming, Washington**

13 177. On or about September 7, 2005, defendants TIEN DUC VU and  
14 GEORGE MICHAEL LEE flew from San Diego, California, to Deming,  
15 Washington.

16 178. In or about early September 2005, defendant GEORGE MICHAEL  
17 LEE offered to bribe a card dealer, whose initials are L.M., to  
18 perform false shuffles at the Nooksack River Casino in Deming,  
19 Washington (hereinafter "Nooksack River Casino"), in furtherance of  
20 the card cheating-scheme.

21 179. In or about early September 2005, defendants GEORGE MICHAEL  
22 LEE and TIEN DUC VU offered to bribe a pit boss, whose initials are  
23 J.N., to help facilitate false shuffles at the Nooksack River Casino  
24 in furtherance of the card-cheating scheme.

25 180. On or about September 11, 2005, defendant TIEN DUC VU  
26 purchased America West Airline tickets in the names of defendants TIEN  
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1 DUC VU and GEORGE MICHAEL LEE for travel from Seattle, Washington, to  
2 San Diego, California, on September 12, 2005.

3 181. On or about September 25, 2005, defendants GEORGE MICHAEL  
4 LEE and TIEN DUC VU traveled from San Diego, California, to Deming,  
5 Washington.

6 182. On or about October 5, 2005, defendants GEORGE MICHAEL LEE  
7 and TIEN DUC VU offered to bribe a card dealer, whose initials are  
8 K.M., to perform false shuffles at the Nooksack River Casino in  
9 furtherance of the card-cheating scheme.

10 183. On or about October 7, 2005, defendant GEORGE MICHAEL LEE  
11 purchased gambling chips for approximately \$6,200 at Nooksack River  
12 Casino.

13 184. On or about October 7, 2005, defendant TIEN DUC VU purchased  
14 gambling chips for approximately \$2,200 at Nooksack River Casino.

15 185. On or about October 7, 2005, the defendants caused card  
16 dealer L.M. to perform a false shuffle at mini-baccarat table #4, at  
17 Nooksack River Casino, creating a slug of approximately thirty-nine  
18 cards, that enabled defendants GEORGE MICHAEL LEE and TIEN DUC VU, and  
19 two unidentified coconspirators to execute the card-cheating scheme  
20 and take approximately \$26,400 from the casino.

21 186. On or about October 7, 2005, defendant GEORGE MICHAEL LEE  
22 cashed out gambling chips for approximately \$21,500 at Nooksack River  
23 Casino.

24 187. On or about October 7, 2005, defendant TIEN DUC VU cashed  
25 out gambling chips for approximately \$13,205 at Nooksack River Casino.

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188. On or about October 21, 2005, defendant GEORGE MICHAEL LEE purchased gambling chips for approximately \$15,500 at Nooksack River Casino.

189. On or about October 21, 2005, defendant TIEN DUC VU purchased gambling chips for approximately \$3,000 at Nooksack River Casino.

190. On or about October 21, 2005, the defendants caused card dealer K.M. to perform a false shuffle at mini-baccarat table #4, at Nooksack River Casino, creating a slug of approximately sixty cards, that enabled defendants GEORGE MICHAEL LEE and TIEN DUC VU, and another coconspirator, whose initials are L.P.N., to execute the card-cheating scheme and take approximately \$29,860 from the casino.

191. On or about October 21, 2005, the defendants caused card dealer K.M. to perform another false shuffle at mini-baccarat table #4, at Nooksack River Casino, creating a slug of approximately fifty-three cards, that enabled defendants GEORGE MICHAEL LEE and TIEN DUC VU to execute the card-cheating scheme and take approximately \$14,950 from the casino.

192. On or about October 21, 2005, defendant GEORGE MICHAEL LEE cashed out gambling chips for approximately \$27,000 at Nooksack River Casino.

193. On or about October 21, 2005, defendant TIEN DUC VU cashed out gambling chips for approximately \$16,000 at Nooksack River Casino.

194. On or about October 22, 2005, defendant GEORGE MICHAEL LEE purchased gambling chips for approximately \$14,100 at Nooksack River Casino.

1        195. On or about October 22, 2005, defendant TIEN DUC VU  
2 purchased gambling chips for approximately \$2,000 at Nooksack River  
3 Casino.

4        196. On or about October 22, 2005, the defendants caused card  
5 dealer L.M. to perform a false shuffle at mini-baccarat table #4, at  
6 Nooksack River Casino, creating a slug of approximately forty-nine  
7 cards, that enabled defendant GEORGE MICHAEL LEE and an unidentified  
8 coconspirator to execute the card-cheating scheme and take  
9 approximately \$3,075 from the casino.

10       197. On or about October 22, 2005, the defendants caused card  
11 dealer L.M. to perform another false shuffle at mini-baccarat table  
12 #4, at Nooksack River Casino, creating a slug of approximately fifty-  
13 three cards, that enabled defendant GEORGE MICHAEL LEE and a  
14 coconspirator to execute the card-cheating scheme and take  
15 approximately \$15,650 from the casino.

16       198. On or about October 22, 2005, defendant GEORGE MICHAEL LEE  
17 cashed out gambling chips for approximately \$17,000 at Nooksack River  
18 Casino.

19       199. On or about October 22, 2005, defendant TIEN DUC VU cashed  
20 out gambling chips for approximately \$10,775 at Nooksack River Casino.

21       200. On or about October 22, 2005, coconspirator L.P.N. cashed  
22 out gambling chips for approximately \$10,832 at Nooksack River  
23 Casino.

24       201. On or about October 27, 2005, defendants GEORGE MICHAEL LEE,  
25 TIEN DUC VU, and HAN TRUONG NGUYEN flew from San Diego, California,  
26 to Deming, Washington.

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1        202. On or about October 28, 2005, defendant GEORGE MICHAEL LEE  
2 purchased gambling chips for approximately \$2,000 at Nooksack River  
3 Casino.

4        203. On or about October 28, 2005, defendant TIEN DUC VU  
5 purchased gambling chips for approximately \$1,500 at Nooksack River  
6 Casino.

7        204. On or about October 28, 2005, the defendants caused card  
8 dealer L.M. to perform a false shuffle at mini-baccarat table #4, at  
9 Nooksack River Casino, creating a slug of approximately sixty-two  
10 cards, in an attempt to enable defendants GEORGE MICHAEL LEE and TIEN  
11 DUC VU to execute the card-cheating scheme.

12        **Resorts East Chicago Hotel and Casino, East Chicago, Indiana**

13        205. In or about early October 2005, defendant SON HONG JOHNSON  
14 attempted to bribe a card dealer, whose initials are C.S., to perform  
15 a false shuffle in furtherance of the card-cheating scheme at a mini-  
16 baccarat table, at the at Resorts East Chicago Hotel and Casino in  
17 East Chicago, Indiana (hereinafter "Resorts East Chicago Casino").

18        206. In or about early October 2005, after initially declining  
19 SON HONG JOHNSON's offer, Resorts East Chicago Casino card dealer  
20 C.S., agreed to participate in the card-cheating scheme.

21        207. On or about October 22, 2005, defendant SON HONG JOHNSON  
22 purchased gambling chips for approximately \$39,000 at mini-baccarat  
23 table #607 at Resorts East Chicago Casino.

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1        208. On or about October 22, 2005, the defendants caused card  
2 dealer C.S. to perform a false shuffle at mini-baccarat table #607,  
3 at Resorts East Chicago Casino, creating a slug that enabled  
4 defendants PHUONG QUOC TRUONG, SON HONG JOHNSON, and MARTIN LEE  
5 ARONSON, and a coconspirator whose initials are A.K.P., to execute the  
6 card-cheating scheme and take approximately \$868,000 from the casino.

7        209. On or about October 22, 2005, at approximately 5:13 a.m.,  
8 defendant SON HONG JOHNSON cashed out gambling chips for approximately  
9 \$906,000 at Resorts East Chicago Casino.

10                    **Isle of Capri Casino, Westlake, Louisiana**

11        210. On or about June 15, 2006, defendants PHUONG QUOC TRUONG,  
12 LIEM THANH LAM, BARRY WELLFORD, and WILLY TRAN, and other  
13 coconspirators drove from defendants PHUONG QUOC TRUONG's and VAN THU  
14 TRAN's house at 12911 Overglen Court, Houston, Texas, to Westlake,  
15 Louisiana, for the purpose of executing the card-cheating scheme.

16        211. On or about June 15, 2006, just before midnight, the  
17 defendants caused a card dealer, whose initials are B.Y., to perform  
18 a false shuffle at blackjack table #201, at the Isle of Capri Casino,  
19 in Westlake, Louisiana, (hereinafter "Isle of Capri Casino") in  
20 furtherance of the card-cheating scheme.

21        212. On or about June 15, 2006, through June 16, 2006, defendants  
22 PHUONG QUOC TRUONG, LIEM THANH LAM, BARRY WELLFORD, WILLY TRAN, and  
23 other coconspirators unsuccessfully attempted to execute the false  
24 shuffle card-cheating scheme at blackjack table #201, at the Isle of  
25 Capri Casino, causing the Tran Organization to lose approximately  
26 \$50,000, including expenses.

**Gold Strike Casino Resort, Tunica, Mississippi**

213. On June 23, 2006, defendant MARTIN LEE ARONSON flew from San Diego, California, to Houston, Texas, aboard Southwest Airlines flight 841, for the purpose of executing the false shuffle card-cheating scheme at the Gold Strike Casino Resort, in Tunica, Mississippi (hereinafter "Gold Strike Casino").

214. On June 26, 2006, defendants PHAT NGOC TRAN, SON HONG JOHNSON, and WILLY TRAN flew from San Diego, California, to Houston, Texas, aboard Southwest Airlines flight 1162, for the purpose of executing the false shuffle card-cheating scheme at the Gold Strike Casino.

215. On July 4, 2006, a coconspirator, whose initials are T.T.L., flew from San Diego, California, to Houston, Texas, aboard Southwest Airlines, for the purpose of executing the false shuffle card-cheating scheme at the Gold Strike Casino.

216. On July 5, 2006, defendants LIEM THANH LAM and PHUONG QUOC TRUONG flew from San Diego, California, to Houston, Texas, aboard Southwest Airlines, for the purpose of executing the false shuffle card-cheating scheme at the Gold Strike Casino.

217. On July 5, 2006, a coconspirator, whose initials are H.D.N., flew from Portland, Oregon to Houston, Texas, aboard Southwest Airlines, for the purpose of executing the false shuffle card-cheating scheme at the Gold Strike Casino.

218. On July 8, 2006, the defendants caused a card dealer, whose initials are B.B., to perform a false shuffle at a blackjack table, at the Gold Strike Casino, creating a slug that enabled defendants PHUONG QUOC TRUONG, SON HONG JOHNSON, PHAT NGOC TRAN, BARRY WELLFORD, WILLY TRAN, LIEM THANH LAM, MARTIN LEE ARONSON, and two

1 coconspirators, whose initials are T.T.L. and R.C.Q., to execute the  
2 false shuffle card-cheating scheme and take money from the casino.

3 219. On or about July 8, 2006, defendant BARRY WELLFORD cashed  
4 out gambling chips for approximately \$70,400 at the Gold Strike  
5 Casino.

6 220. On or about July 8, 2006, defendant PHUONG QUOC TRUONG  
7 instructed defendant PHAT NGOC TRAN to pay card dealer B.B.  
8 approximately \$3,000 for participating in the false shuffle card-  
9 cheating scheme executed at the Gold Strike Casino on or about July  
10 8, 2006.

11 221. On or about July 8, 2006, defendant PHAT NGOC TRAN paid card  
12 dealer B.B. approximately \$3,000 for participating in the false  
13 shuffle card-cheating scheme executed at the Gold Strike Casino on or  
14 about July 8, 2006.

15 **Horseshoe Casino and Hotel, Tunica, Mississippi**

16 222. On April 26, 2006, the defendants caused a card dealer,  
17 whose initials are L.M., to perform a false shuffle at a blackjack  
18 table, at the Horseshoe Casino and Hotel, in Tunica, Mississippi  
19 (hereinafter "Horseshoe Casino"), creating a slug that enabled  
20 defendants PHUONG QUOC TRUONG, LIEM THANH LAM, and MARTIN LEE ARONSON,  
21 and coconspirator R.C.Q. to execute the false shuffle card-cheating  
22 scheme and take money from the casino.

23 223. On or about April 26, 2006, defendant MARTIN LEE ARONSON  
24 cashed out gambling chips for approximately \$80,000 at Horseshoe  
25 Casino.

26 224. On July 14, 2006, defendant PHUONG QUOC TRUONG flew from San  
27 Diego, California, to Houston, Texas for the purpose of executing the  
28 false shuffle card-cheating scheme at the Horseshoe Casino.



1       225. On July 15, 2006, defendants MARTIN LEE ARONSON and SON HONG  
2 JOHNSON flew from San Diego, California, to Houston, Texas, aboard  
3 Southwest Airlines flight 1162, for the purpose of executing the false  
4 shuffle card-cheating scheme at the Horseshoe Casino.

5       226. On July 16, 2006, defendant WILLY TRAN flew from San Diego,  
6 California, to Houston, Texas, aboard Southwest Airlines flight 1162,  
7 for the purpose of executing the false shuffle card-cheating scheme  
8 at the Horseshoe Casino.

9       227. On July 18, 2006, the defendants caused card dealer L.M. to  
10 perform a false shuffle at a blackjack table, at the Horseshoe Casino,  
11 creating a slug that enabled defendants PHUONG QUOC TRUONG, SON HONG  
12 JOHNSON, PHAT NGOC TRAN, BARRY WELLFORD, WILLY TRAN, and MARTIN LEE  
13 ARONSON, and a coconspirator, whose initials are B.P.L., to execute  
14 the false shuffle card-cheating scheme and take money from the casino.

15       228. On or about July 18, 2006, defendant SON HONG JOHNSON cashed  
16 out gambling chips for approximately \$19,000 at Horseshoe Casino.

17       229. On or about July 19, 2006, defendant PHUONG QUOC TRUONG  
18 instructed defendant PHAT NGOC TRAN to pay card dealer L.M.  
19 approximately \$500 for participating in the false shuffle card-  
20 cheating scheme executed at the Horseshoe Casino on or about July 18,  
21 2006.

22       230. On or about July 19, 2006, defendant PHAT NGOC TRAN paid  
23 card dealer L.M. approximately \$500 for participating in the false  
24 shuffle card-cheating scheme executed at the Horseshoe Casino on or  
25 about July 18, 2006.

1                   **Sycuan Resort and Casino, El Cajon, California**

2           231. During a telephone call on or about July 10, 2006, defendant  
3 VAN THU TRAN warned defendant PHUONG QUOC TRUONG to be careful because  
4 Sycuan Resort and Casino had recently installed "zooming devices"  
5 (surveillance cameras with zoom-lenses).

6           232. On or about July 10, 2006, defendant PHUONG QUOC TRUONG flew  
7 from Houston, Texas, to San Diego, California, aboard Continental  
8 Airlines, for the purpose of bribing two card dealers, whose initials  
9 are B.A. and J.N., to perform false shuffles for the card-cheating  
10 scheme at the Sycuan Casino.

11          233. On or about July 10, 2006, defendant SON HONG JOHNSON flew  
12 from Houston, Texas, to San Diego, California, aboard Southwest  
13 Airlines, to execute the card-cheating scheme at the Sycuan Casino.

14          234. On or about July 10, 2006, in San Diego, California,  
15 defendants PHUONG QUOC TRUONG and MARTIN LEE ARONSON met with Sycuan  
16 Casino dealers B.A. and J.N., and with other coconspirators, to  
17 promote and plan the false shuffle card-cheating scheme at Sycuan  
18 Casino.

19          235. On or about July 12, 2006, in San Diego, California,  
20 defendant MARTIN LEE ARONSON trained Sycuan Casino dealers B.A. and  
21 J.N. to perform the false shuffle and instructed them to practice on  
22 their own.

23          236. On or about July 14, 2006, in San Diego, California, at the  
24 direction of defendant PHUONG QUOC TRUONG, defendant MARTIN LEE  
25 ARONSON met with card dealer B.A. and other coconspirators to promote  
26 and plan the false shuffle scheme at Sycuan Casino.



1       237. On or about July 14, 2006, defendant PHUONG QUOC TRUONG flew  
2 from San Diego, California, to Houston, Texas, to obtain cash to be  
3 used in the card-cheating scheme.

4       238. On or about July 24, 2006, defendants PHAT NGOC TRAN, LIEM  
5 THANH LAM, WILLY TRAN, BARRY WELLFORD, and three coconspirators whose  
6 initials are M.H., B.M., and T.T.L., occupied all of the seats at  
7 blackjack table #13, at Sycuan Casino, where card dealer B.A. was  
8 dealing, to facilitate the execution of the false shuffle card-  
9 cheating scheme.

10       239. On or about July 24, 2006, using a hidden microphone and a  
11 cellular telephone, defendant WILLY TRAN recorded and transmitted the  
12 order of cards as they were dealt at blackjack table #13, at Sycuan  
13 Casino, by card dealer B.A., in order to facilitate the card-cheating  
14 scheme.

15       240. On or about July 25, 2006, shortly after midnight, defendant  
16 SON HONG JOHNSON told defendant PHUONG QUOC TRUONG, during a telephone  
17 call, that their efforts to cheat did not succeed because their phones  
18 did not work and that they had been unable to track the order of  
19 cards.

20       241. On or about August 1, 2006, a co-conspirator, whose  
21 initials are H.G.V., joined blackjack table #14, at Sycuan Casino,  
22 where card dealer B.A. was dealing, and purchased \$3,000 of gambling  
23 chips for the purpose of executing the false shuffle card-cheating  
24 scheme.

25       242. On or about August 1, 2006, defendant WILLY TRAN used a  
26 hidden microphone and a cellular telephone to transmit the order of  
27 cards as they were dealt at blackjack table #14, at Sycuan Casino, by  
28

1 card dealer B.A, in order to facilitate the false shuffle card-  
2 cheating scheme.

3 243. On or about August 1, 2006, the defendants caused card  
4 dealer B.A. to perform a false shuffle at blackjack table #14, at the  
5 Sycuan Casino, creating a slug of approximately 96 cards, that enabled  
6 defendant WILLY TRAN, coconspirator H.G.V., and other coconspirators  
7 to execute the card-cheating scheme and take approximately \$22,600  
8 from the casino.

9 244. On or about August 1, 2006, shortly after the slug came into  
10 play, coconspirator H.G.V. purchased another \$3,000 of gambling chips  
11 at blackjack table #14, at Sycuan Casino.

12 245. On or about August 1, 2006, coconspirator H.G.V. cashed out  
13 gambling chips for approximately \$25,150 at the Sycuan Casino.

14 **Imperial Palace Casino, Biloxi, Mississippi**

15 246. On or about June 6, 2006, defendants PHUONG QUOC TRUONG,  
16 LIEM THANH LAM, VAN THU TRAN, WILLY TRAN, and another coconspirator,  
17 whose initials are T.T.L., flew aboard Southwest Airlines Flight #841  
18 from San Diego, California, to Houston, Texas.

19 247. On or about June 8, 2006, defendants PHUONG QUOC TRUONG, and  
20 LIEM THANH LAM traveled from Houston, Texas, to Biloxi, Mississippi,  
21 with the intent to bribe an undercover agent (hereinafter "UC-1"),  
22 whom they believed to be a supervisor from the Imperial Palace Casino  
23 in Biloxi, Mississippi (hereinafter "Imperial Palace Casino"), to  
24 facilitate the false shuffle card-cheating scheme.

25 248. On or about June 8, 2006, at the Imperial Palace Casino,  
26 defendant PHUONG QUOC TRUONG met with UC-1, who was posing as a floor  
27 supervisor at the casino, and attempted to bribe UC-1 by giving him  
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1 \$500 and offering to bribe UC-1 in the future, if he would help  
2 defendant PHUONG QUOC TRUONG execute the false shuffle card-cheating  
3 scheme.

4 249. On August 7, 2006, defendants MARTIN LEE ARONSON and BARRY  
5 WELLFORD flew aboard Southwest Airlines Flights #1653 and #1169 from  
6 Las Vegas, Nevada, to Houston, Texas, to facilitate the false shuffle  
7 card-cheating scheme.

8 250. On or about August 15, 2006, defendant PHUONG QUOC TRUONG  
9 drove from his home in Houston, Texas, to Biloxi, Mississippi, with  
10 the intent to bribe another undercover agent (hereinafter "UC-2"),  
11 whom defendant PHUONG QUOC TRUONG believed to be a card dealer at the  
12 Imperial Palace Casino, to perform false shuffles for the card-  
13 cheating scheme.

14 251. On or about August 15, 2006, in a hotel room at the Imperial  
15 Palace Casino, defendant PHUONG QUOC TRUONG offered to bribe UC-2 with  
16 at least \$3,000, to perform false shuffles for the card-cheating  
17 scheme.

18 252. On or about August 15, 2006, in a hotel room at the Imperial  
19 Palace Casino, defendant PHUONG QUOC TRUONG arranged for defendant  
20 MARTIN LEE ARONSON to train UC-2 to perform false shuffles for the  
21 card-cheating scheme.

22 253. On or about August 16, 2006, in a hotel room at the  
23 Imperial Palace Casino, defendant MARTIN LEE ARONSON trained UC-2 to  
24 perform false shuffles for the card-cheating scheme.

25 All in violation of Title 18, United States Code, Section  
26 1962(d).

Count 2  
18 U.S.C. § 371

**(Conspiracy to Commit Offenses Against the United States)**

1. The allegations contained in paragraphs 1 through 30 of the General Allegations and Count 1 of this Indictment are realleged in Count 2 and incorporated by reference as if fully set forth herein.

2. From in or about March 2002 and continuing to the present, within the Southern District of California and elsewhere, defendants, PHUONG QUOC TRUONG, aka "Pai Gow" John, aka John Truong, VAN THU TRAN, TAI KHIEM TRAN, ANH PHUONG TRAN, PHAT NGOC TRAN, MARTIN LEE ARONSON, aka Martin Smith, LIEM THANH LAM, GEORGE MICHAEL LEE, TIEN DUC VU, SON HONG JOHNSON, BARRY WELLFORD, NAM VAN TO, aka "Tommy," KHAI HONG TRAN, JOHN TRAN, WILLY TRAN, aka "Duy," TUAN MONG LE, DUC CONG NGUYEN, HAN TRUONG NGUYEN, and HA THUY GIANG, aka Thuy Ha Giang, did, knowingly, willfully, and unlawfully conspire, confederate and agree with each other and other persons known and unknown to the grand jury, to commit the following crimes against the United States:

a. to abstract, purloin, and willfully misapply, and take and carry away with intent to steal, money, funds, assets, and other property of a value in excess of one thousand dollars (\$1,000) belonging to a gaming establishment operated by and for, and licensed by an Indian Tribe pursuant to an ordinance and resolution approved by the National Indian Gaming Commission; in violation of Title 18, United States Code, Section 1167(b);

b. to devise a scheme and artifice to defraud, and transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing the scheme and

1 artifice to defraud to affect a financial institution; in violation  
2 of Title 18, United States Code, Section 1343;

3 c. to use bribery to obstruct, delay, and prevent the  
4 communication of information relating to a violation of any criminal  
5 statute of the United States by any person to a criminal investigator;  
6 in violation of Title 18, United States Code, Section 1510;

7 d. to use intimidation, threaten, and corruptly persuade  
8 another person, and attempt to do so, with intent to hinder, delay,  
9 and prevent the communication to a law enforcement officer and judge  
10 of the United States of information relating to the commission and  
11 possible commission of a federal offense; in violation of Title 18,  
12 United States Code, Section 1512;

13 e. to travel and cause travel in interstate and foreign  
14 commerce, and use a facility in interstate and foreign commerce, with  
15 intent to promote, manage, establish, carry on, and facilitate the  
16 promotion, management, establishment, and carrying on, of unlawful  
17 activity, to wit: a business enterprise involving gambling, and  
18 bribery; in violation of the law of the States of California,  
19 Connecticut, Indiana, Mississippi, Nevada, Louisiana, and Washington,  
20 and thereafter perform and attempt to perform said unlawful activity,  
21 in violation of Title 18, United States Code, Section 1952;

22 f. to transport, transmit, and transfer in interstate and  
23 foreign commerce goods, wares, merchandise, securities, and money of  
24 the value of \$5,000 and more, knowing the same to have been stolen,  
25 converted, and taken by fraud; in violation of Title 18, United States  
26 Code, Section 2314; and

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g. to receive, possess, conceal, store, barter, sell, and dispose of goods, wares, and merchandise, securities, and money, of the value of \$5,000 and more, which have crossed a state and United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken; in violation of Title 18, United States Code, Section 2315;

All in violation of Title 18, United States Code, Sections 371 and 2.

Count 3  
18 U.S.C. § 1956(h)  
(Conspiracy to Launder Money and to Engage in Monetary Transactions  
in Property Derived from Specified Unlawful Activity)

1. The allegations contained in paragraphs 1 through 30 of the General Allegations and Counts 1 and 2, of this Indictment are realleged in Count 3 and incorporated by reference as if full set forth herein.

2. From in or about March 2002 and continuing to the present, within the Southern District of California and elsewhere, defendants, PHUONG QUOC TRUONG, aka "Pai Gow" John, aka John Truong, VAN THU TRAN, TAI KHIEM TRAN, ANH PHUONG TRAN, PHAT NGOC TRAN, MARTIN LEE ARONSON, aka Martin Smith, LIEM THANH LAM, GEORGE MICHAEL LEE, TIEN DUC VU, SON HONG JOHNSON, BARRY WELLFORD, NAM VAN TO, aka "Tommy," KHAI HONG TRAN, JOHN TRAN, WILLY TRAN, aka "Duy," TUAN MONG LE, DUC CONG NGUYEN, HAN TRUONG NGUYEN, and HA THUY GIANG, aka Thuy Ha Giang, did knowingly, willfully, and unlawfully conspire, confederate and agree with each other and other persons known and unknown to the grand jury, to commit the following offenses:

a. to conduct and attempt to conduct financial transactions with property representing the proceeds of some form of

1 specified unlawful activity, with the intent to promote the carrying  
2 on of said specified unlawful activity, and to conceal and disguise  
3 the nature, location, source, ownership, and control of the proceeds  
4 of the specified unlawful activity, and to avoid a transaction  
5 reporting requirement under state and federal law; in violation of  
6 Title 18, United States Code, Sections 1956(a)(1)(A)(I) and  
7 (a)(1)(B)(I);

8 b. to engage and attempt to engage in monetary  
9 transactions in criminally derived property having a value greater  
10 than \$10,000; in violation of Title 18, United States Code, Section  
11 1957.

12 All in violation of Title 18, United States Code, Sections  
13 1956(h) and (2).

14 **Forfeiture Allegation 1**  
15 **(RICO Conspiracy)**

16 1. The allegations contained in paragraphs 1 through 30 of the  
17 General Allegations and Counts 1 of this Indictment are hereby  
18 repeated, realleged, and incorporated by reference herein as though  
19 fully set forth at length for the purpose of alleging forfeiture of  
20 property in which the defendants have an interest pursuant to the  
21 provisions of Title 18, United States Code, Section 1963. Pursuant  
22 to Fed. R. Crim. P. 32.2, notice is hereby given to the defendants  
23 that the United States will seek forfeiture as part of any sentence  
24 in accordance with Title 18, United States Code, Section 1963, in the  
25 event of any defendant's conviction under Count 1 of the Indictment.

26 2. Defendants, PHUONG QUOC TRUONG, aka "Pai Gow" John, aka John  
27 Truong, VAN THU TRAN, TAI KHIEM TRAN, ANH PHUONG TRAN, PHAT NGOC TRAN,  
28 MARTIN LEE ARONSON, aka Martin Smith, LIEM THANH LAM, GEORGE MICHAEL



1 LEE, TIEN DUC VU, SON HONG JOHNSON, BARRY WELLFORD, WILLY TRAN, aka  
2 "Duy," HAN TRUONG NGUYEN, and HA THUY GIANG, aka Thuy Ha Giang:

3 a. have acquired and maintained interests in violation of  
4 Title 18, United States Code, Section 1962, which interests are  
5 subject to forfeiture to the United States pursuant to Title 18,  
6 United States Code, Section 1963(a)(1);

7 b. have an interest in, security of, claims against, and  
8 property and contractual rights which afford a source of influence  
9 over, the Enterprise named and described herein which the defendants  
10 established, operated, controlled, conducted, and participated in the  
11 conduct of, in violation of Title 18, United States Code, Section  
12 1962, which interests, securities, claims, and rights are subject to  
13 forfeiture to the United States pursuant to Title 18, United States  
14 Code, Section 1963 (a)(2); and

15 c. have property constituting and derived from proceeds  
16 obtained, directly and indirectly, from racketeering activity, in  
17 violation of Title 18, United States Code, Section 1962, which  
18 property is subject to forfeiture to the United States pursuant to  
19 Title 18, United States Code, Section 1963(a)(3).

20 3. The interests of the defendants subject to forfeiture to the  
21 United States pursuant to Title 18, United States Code, Sections  
22 1963(a)(1), (a)(2), and (a)(3), include, but are not limited to:

23 a. At least \$3,351,781.

24 b. 1361 Surfwood Lane, San Diego, California, owned and  
25 used by defendants PHUONG QUOC TRUONG and VAN THU  
26 TRAN.

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- c. Washington Mutual Bank account number 861-392187-9, owned by defendant TAI KHIEM TRAN.
- d. Washington Mutual Bank account number 095363582-1, in the name of Howard A. Johnson.
- e. Bank of America account number 01664-02168, owned and used by defendant VAN THU TRAN.
- f. Bank of America account number 09177-02418, owned and used by defendant VAN THU TRAN.
- g. 2004 Honda Accord, VIN JHMCM56704C012025, registered to defendant HA THUY GIANG.
- h. 2003 Cadillac Escalade, VIN 1GYEK63N43R155400, registered to defendant GEORGE MICHAEL LEE.
- i. 2001 Porsche 911 Carrera, VIN WP0AB29941S685265, registered to defendant PHUONG QUOC TRUONG.
- j. 2006 Honda Accord, VIN 1HGCM82646A003439, in the name of Howard A. Johnson.
- k. 2006 Toyota Camry, VIN JTDBA32K960026563, registered to defendant HA THUY GIANG.
- l. 2007 Toyota Tacoma Truck, VIN 5TEJU62N67Z361649, registered to defendant VAN THU TRAN.
- m. 2007 Toyota Tacoma Truck, VIN 5TEJU62N97Z342528, registered to defendant PHUONG QUOC TRUONG.
- n. 2002 Dodge Ram Van, VIN 2B6HB11Y22K135915, registered to defendant PHUONG QUOC TRUONG.
- o. Rolex Presidential watch, owned by defendant PHUONG QUOC TRUONG.

1       4. If by any act or omission of the defendants, any of the  
2 property described above:

- 3           a. cannot be located upon the exercise of due diligence;  
4           b. has been transferred or sold to, or deposited with, a  
5           third party;  
6           c. has been placed beyond the jurisdiction of the Court;  
7           d. has been substantially diminished in value; or  
8           e. has been commingled with other property which cannot  
9           be divided without difficulty;

10 it is the intention of the United States, pursuant to the procedures  
11 outlined at Title 21, United States Code, Section 853(p), to seek  
12 forfeiture of any other property of the defendants up to the value of  
13 such forfeitable property.

14       5. The above-named defendants, and each of them, are jointly  
15 and severally liable for the forfeiture obligations as alleged above.

16 All pursuant to Title 18, United States Code, Section 1963.

17                   **Forfeiture Allegation 2**  
18                   **(Money Laundering)**

19       1. The allegations contained in paragraphs 1 through 30 of the  
20 General Allegations and Counts 1 through 3 of this Indictment are  
21 hereby repeated, realleged, and incorporated by reference herein as  
22 though fully set forth at length for the purpose of alleging  
23 forfeitures pursuant to the provisions of Title 18, United States  
24 Code, Sections 982(a)(1) and 1956(h).

25       2. The defendants, PHUONG QUOC TRUONG, aka "Pai Gow" John, aka  
26 John Truong, VAN THU TRAN, TAI KHIEM TRAN, ANH PHUONG TRAN, PHAT NGOC  
27 TRAN, MARTIN LEE ARONSON, aka Martin Smith, LIEM THANH LAM, GEORGE  
28 MICHAEL LEE, TIEN DUC VU, SON HONG JOHNSON, BARRY WELLFORD, NAM VAN  
TO, aka "Tommy," KHAI HONG TRAN, JOHN TRAN, WILLY TRAN, aka "Duy,"

1 TUAN MONG LE, DUC CONG NGUYEN, HAN TRUONG NGUYEN, and HA THUY GIANG,  
2 aka Thuy Ha Giang, who are convicted of one or more of the offenses  
3 set forth in Count Four shall forfeit to the United States the  
4 following property: (a) all right, title, and interest in any and all  
5 property involved in each offense in violation of Title 18, United  
6 States Code, Sections 1956 and 1957, or conspiracy to commit such  
7 offense, for which the defendant is convicted, and all property  
8 traceable to such property, including the following: (1) all money  
9 or other property that was the subject of each transaction,  
10 transportation, transmission, or transfer in violation of Sections  
11 1956 and 1957; (2) all commissions, fees, and other property  
12 constituting proceeds obtained as a result of those violations; and  
13 (3) all property used in any manner or part to commit or to facilitate  
14 the commission of those violations; and (b) A sum of money equal to  
15 the total amount of money involved in each offense, or conspiracy to  
16 commit such offense, for which the defendant is convicted; including,  
17 but not limited to the following:

- 18 a. At least \$3,351,781.
  - 19 b. 1361 Surfwood Lane, San Diego, California, owned and  
20 used by defendants PHUONG QUOC TRUONG and VAN THU  
21 TRAN.
  - 22 c. 10503 Laurel Path, Escondido, California, owned and  
23 used by defendants PHUONG QUOC TRUONG and VAN THU  
24 TRAN.
  - 25 d. 10021 Resmar Court, La Mesa, California, owned by  
26 defendant TAI KHIEM TRAN.
- 27  
28

- 1 e. Washington Mutual Bank account number 861-392187-9,  
2 owned by defendant TAI KHIEM TRAN.
- 3 f. Washington Mutual Bank account number 095363582-1, in  
4 the name of Howard A. Johnson.
- 5 g. Bank of America account number 01664-02168, owned and  
6 used by defendant VAN THU TRAN.
- 7 h. Bank of America account number 09177-02418, owned and  
8 used by defendant VAN THU TRAN.
- 9 i. 2004 Honda Accord, VIN JHMCM56704C012025, registered  
10 to defendant HA THUY GIANG.
- 11 j. 2003 Cadillac Escalade, VIN 1GYEK63N43R155400,  
12 registered to defendant GEORGE MICHAEL LEE.
- 13 k. 2001 Porsche 911 Carrera, VIN WP0AB29941S685265,  
14 registered to defendant PHUONG QUOC TRUONG.
- 15 l. 2006 Honda Accord, VIN 1HGCM82646A003439, in the name  
16 of Howard A. Johnson.
- 17 m. 2006 Toyota Camry, VIN JTDBA32K960026563, registered  
18 to defendant HA THUY GIANG.
- 19 n. 2007 Toyota Tacoma Truck, VIN 5TEJU62N67Z361649,  
20 registered to defendant VAN THU TRAN.
- 21 o. 2007 Toyota Tacoma Truck, VIN 5TEJU62N97Z342528,  
22 registered to defendant PHUONG QUOC TRUONG.
- 23 p. 2002 Dodge Ram Van, VIN 2B6HB11Y22K135915, registered  
24 to defendant PHUONG QUOC TRUONG.
- 25 q. Rolex Presidential watch, owned by defendant PHUONG  
26 QUOC TRUONG.
- 27  
28

1        3.    If by any act or omission of the defendants, any of the  
2 property described above:

- 3            a.    cannot be located upon the exercise of due diligence;
- 4            b.    has been transferred or sold to, or deposited with, a
- 5                    third party;
- 6            c.    has been placed beyond the jurisdiction of the Court;
- 7            d.    has been substantially diminished in value; or
- 8            e.    has been commingled with other property which cannot
- 9                    be divided without difficulty;

10 the United States of America shall be entitled to forfeiture of  
11 substitute property under the provisions of Title 21, United States  
12 Code, Section 853(p), as incorporated by Title 28, United States Code,  
13 Section 2461(c).

14        4.    If more than one defendant is convicted of an offense, the  
15 defendants so convicted are jointly and severally liable for the  
16 amount involved in such offense.

17        5.    Pursuant to Title 21, United States Code, Section 853(p),  
18 as incorporated by Title 18, United States Code, Section 982(b), each  
19 defendant shall forfeit substitute property, up to the value of the  
20 amount described above in the Forfeiture Allegation, if, by any act  
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1 or omission of the defendant, the property described above in this:  
2 Forfeiture Allegation, or any portion thereof, cannot be located upon  
3 the exercise of due diligence; has been transferred, sold to or  
4 deposited with a third party; has been placed beyond the jurisdiction  
5 of the court; has been substantially diminished in value; or has been  
6 commingled with other property which cannot be divided without  
7 difficulty.

8 All pursuant to Title 18, United States Code, Section 982(a)(1)  
9 and Fed. R. Crim. P. 32.2(a).


10 DATED: May 22, 2007.


11 A TRUE BILL:


12   
13 FOREPERSON

14 KAREN P. HEWITT  
15 United States Attorney

16 BRUCE G. OHR  
17 Chief, Organized Crime  
18 and Racketeering Section  
19 Department of Justice

20   
21 GAVIN A. CORN  
22 Trial Attorney, Department of Justice

23   
24 JOSEPH K. WHEATLEY  
25 Trial Attorney, Department of Justice

26   
27 ROBERT S. TULLY  
28 Trial Attorney, Department of Justice